



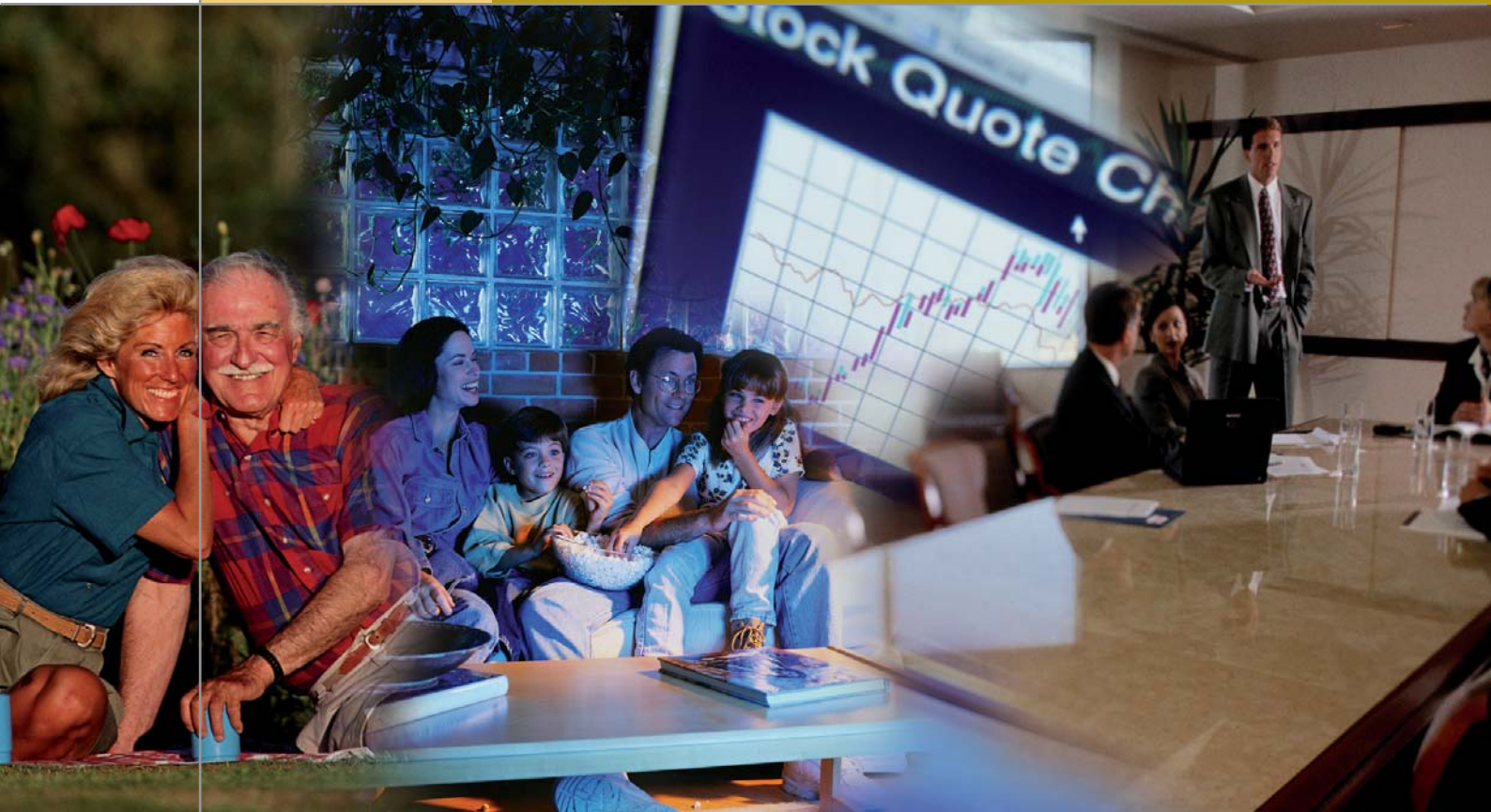
GOLD FINANCIAL PTY LTD

AUSTRALIAN FINANCIAL SERVICES LICENCE NUMBER 291389
ABN 50 113 653 946

FINANCIAL SERVICES GUIDE

Our Purpose Statement...

Our purpose is to provide a financially sound organisation of professionals to act together with a common goal in building lasting business and personal relationships.



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ASSOCIATION OF FINANCIAL ADVISERS LTD

Gold Financial Pty Ltd is a proud Corporate Member of the AFA



INTRODUCTION

Welcome to Gold Financial!

An important task, at the start of our relationship, is to let you know from the outset that you have the right to ask us about our charges, the type of advice we will give you, and what you can do if you have a complaint about our services.

This Financial Services Guide (FSG) is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. The matters covered by the FSG include

- who we are;
- how we can be contacted;
- what financial services we are authorised to provide to you;
- the remuneration and other benefits received by Gold Financial Pty Ltd, (Gold Financial), as Licensee, your adviser and any other relevant parties;
- details of any potential conflict of interest;
- details of our internal and external dispute resolution procedures and how you can access them; and
- details of our Professional Indemnity Insurance cover.

It is intended that this FSG should assist you in determining whether to use any of the services described within this FSG.

You should also be aware that you are entitled to receive a Statement of Advice (SOA) whenever we provide you with any advice which takes into account your financial objectives, financial circumstances, needs and requirements. The SOA will contain the advice, the basis on which it is given and information about fees, commissions and associations that may have influenced the provision of the advice. You should only implement this advice after taking the time to read and understand the SOA.

Where further advice is provided, we may not provide you with a SOA where your relevant personal circumstances and the basis of the further advice are not significantly different to those which existed at the time you were previously provided with advice. If you have not been provided with a Record of Further Advice you may request one from your adviser by telephone, fax or e-mail.

In the event we make a recommendation to you to acquire a particular financial product (other than securities) or offer to issue or arrange the issue of a financial product on your behalf, we must also provide you with a Product Disclosure Statement (PDS) containing information about the particular product that will enable you to make an informed decision in relation to the acquisition of that product. You may have a statutory fourteen (14) day cooling-off period for the return of certain financial products and you should refer to the PDS for details, if applicable, relating to any cooling-off period.

WHO PROVIDES THE FINANCIAL SERVICE?

Gold Financial is the holder of an Australian Financial Services Licence (Licence Number 291389) and is the Licensee. The distribution of the FSG to you by your adviser has been authorised by Gold Financial.

Your adviser is an authorised representative of Gold Financial and is regarded as the 'providing entity' under legislation. Please refer to the Adviser Profile which forms part of this FSG, for details regarding your adviser. Your adviser operates a privately owned business and is not an employee of Gold Financial.

Gold Financial is a corporate member of the Association of Financial Advisers.

WHAT FINANCIAL SERVICES IS GOLD FINANCIAL AUTHORISED TO PROVIDE ME?

Gold Financial is licensed to provide financial product advice in respect of the following classes of products:

1. Deposit and payment products limited to basic deposit products;
2. General insurance products;
3. Life products including:
 - (i) investment life insurance products*; and
 - (ii) life risk insurance*;
** as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds*
4. Interests in managed investment schemes including investor directed portfolio services; and
5. Superannuation.

Gold Financial is also licensed to deal in a financial product by:

1. Applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (i) deposit and payment products limited to basic deposit products;
 - (ii) general insurance products
 - (iii) life products including:
 - a) investment life insurance products*; and
 - b) life risk insurance products*;
** as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds*
 - (iv) interests in managed investment schemes including investor directed portfolio services; and
 - (v) superannuation; and
2. Issuing general insurance products only.

Gold Financial does not allow authorised representatives to advise or deal in general insurance products and securities.

Please refer to your Adviser Profile for details on the financial products and services which Gold Financial has authorised your adviser to provide to you.

In most cases your adviser will provide you with personal advice. However, if you do not require personal advice, general advice is also available. General advice does not consider your personal circumstances.

Your adviser may offer services other than financial services. For example, they may also act as your accountant or legal adviser, or advise you on real estate investments. While your adviser may offer these services you should understand that they are not provided under Gold Financial's licence. Gold Financial does not train, support or supervise your adviser in supplying these services nor is Gold Financial liable for these services.

Examples of the services which Gold Financial is not responsible for include:

1. Finance broking services;
2. Real estate and direct property advice;
3. Taxation services, such as completion of tax returns;
4. Accounting and audit services;



5. Legal services; and
6. Administration and compliance of self-managed superannuation funds, except where offered through a platform/service through a Gold Financial endorsed provider.

Gold Financial does not allow its authorised representatives to:

1. Act as a Trustee for you or operate a trust account on your behalf;
2. Hold a Power of Attorney (unless a direct family member or approved by Gold Financial); or
3. Hold funds or have access to withdraw funds on your behalf.

GOLD FINANCIAL'S APPROVED PRODUCT LIST

Gold Financial maintains an Approved Product List (APL) of financial products. The list is subject to a stringent compliance research programme. All product issuers are required to pay Gold Financial a fee of up to \$4,950 annually to subsidise the costs of research compliance.

A select group of product suppliers have been invited to be preferred partners. Preferred partners provide technical, educational and marketing support to Gold Financial and its authorised representatives to assist in development. Preferred partners pay Gold Financial a fee of up to \$13,200 per annum which includes the cost of product compliance research.

NOTE: All fees and charges throughout this FSG are paid to Gold Financial and are inclusive of GST.

The following product suppliers participate in Gold Financial's preferred partner programme:

- AIA
- Asteron
- Colonial First State
- CommInsure
- GIS Concepts
- ING
- Tower
- Tranzact

Gold Financial's comprehensive APL allows your adviser to select an appropriate product for you. A copy of the APL can be supplied to you upon request.

RELATIONSHIPS AND ASSOCIATIONS WHICH MAY INFLUENCE GOLD FINANCIAL IN PROVIDING YOU WITH FINANCIAL SERVICES

Gold Financial has a vested interest in companies that promote the following products:

- Smartsave 'Member's Choice' Superannuation Master Plan (Smartsave);
- Smartrisk Protection Plan (Smartrisk); and
- Integroup Life Insurance Plan (Integroup).

Smartsave is the preferred superannuation fund for Gold Financial. Gold Financial owns shares in Group Insurance & Superannuation Concepts Pty Ltd (GIS Concepts) which holds the promoter rights for Smartsave, Smartrisk and Integroup. Gold Financial also owns shares

in ASX listed, Tranzact Financial Services Ltd (Tranzact). Tranzact is the provider of administrative support to Smartsave and the Gold Private Super platform.

Gold Financial and its authorised representatives receive management support, technical support and tools from both GIS Concepts and Tranzact to enable them to provide responsive and high quality financial advice to you.

Your adviser is neither obligated nor limited to recommending the Smartsave, Smartrisk and Integroup range of products.

WHO DOES MY ADVISER ACT FOR WHEN HE/SHE PROVIDES FINANCIAL SERVICES TO ME?

Your adviser will be acting for you on behalf of Gold Financial as its Authorised Representative and Gold Financial is responsible to you for any financial products and services authorised by Gold Financial that your adviser provides to you.

HOW WILL I PAY FOR THE SERVICE AND DO YOU RECEIVE REMUNERATION, COMMISSION, FEES OR OTHER BENEFITS WHEN PROVIDING THE FINANCIAL SERVICES TO ME? HOW IS THAT REMUNERATION CALCULATED?

The Licensee

Gold Financial initially receives all commissions and fees for service amounts and subsequently forwards 100% of these payments to the respective authorised representative. The SOA will disclose the manner in which the commissions and fees are split between Gold Financial and the authorised representative, and any referring party where applicable.

Gold Financial does not charge you any additional fees. However your adviser pays Gold Financial a licensing fee of \$1,100 a month to cover the costs associated with being an authorised representative.

The Authorised Representative

Upfront fees - the amount of upfront fees paid to your adviser will vary according to the particular arrangement Gold Financial has with each product provider but will generally be in the range of 0% to 12% per annum of your invested funds, and 0% to 148.5% of the total premium paid for risk insurance products. For example:

1. *Investment Products* - if you invested \$10,000 into an investment product and your adviser charges a 5.5% upfront fee, he/she will receive \$550 from the product provider.
2. *Risk Insurance Products* - if you take up an insurance policy with premium totalling \$250 and your adviser charges an 80% upfront fee, he/she will receive \$200 from the product provider.

These payments are not an additional cost to you but are paid by the product provider to your adviser.

Alternatively, your adviser may charge a fee for service payable by you based on either the time he/she spends developing your SOA or the value of funds invested. If you choose to pay a fee for service, your adviser may rebate to you part or all of the fee Gold Financial would otherwise receive from the product provider.





Your adviser will invoice you for the relevant fee when you receive your SOA. This fee will be agreed with you prior to commencing work on your SOA. Please note that Gold Financial reserves the right to charge a higher fee if your requirements are exceptionally complex. In addition, if your circumstances change significantly after we have prepared a SOA for you, and you require further advice taking into account this change, we may charge another fee for the preparation of a new SOA.

Ongoing fees (trails) - ongoing management fees are payable as agreed by you with your adviser. Your adviser may receive, ongoing, or what is called a trailing fee, which may form part of the fund managers' management fee and in most cases, is not an extra charge to you. The amount of ongoing fees paid to your adviser will vary according to the particular arrangement with each product provider but will generally be in the range of 0% to 3.3% per annum of your invested funds, and 0% to 38.5% of the total premium paid for risk insurance products.

For example:

1. *Investment Products* - if your investment portfolio totals \$100,000 and your adviser charges a 1.1% per annum trail fee, he/she will receive \$1,100 per annum from the product provider.
2. *Insurance Products* - if your insurance policy's premium is \$250 per annum and your adviser charges a 10% trail fee, he/she will receive \$25 per annum trail commission from the product provider.

The referral party

Should you be referred to your adviser by a third party, (for example, an accountant), the third party will in most cases receive a fee for the referral. You will receive more detailed information concerning any referral fee from the person who referred you to your adviser.

OUR SERVICES

Fees and charges for advice services

If you use the following services, your adviser will provide you with personal advice. This means that they will take into account one or more of your objectives, financial situation and needs.

Fees payable under the Services outlined below will be disclosed in your SOA.

Financial planning service

Financial Planning considers your individual needs and objectives, your investment timeframe and tolerance for risk. Your adviser will formulate an appropriate investment strategy and then create a personalised SOA.

Once you have accepted the SOA your adviser will then assist you with the implementation of the recommendations. The Financial Planning Service may also include a comprehensive annual review and other ongoing services.

Defined advice service

The Defined Advice Service allows prompt preparation of a SOA, defined in its scope.

Under this service, you can choose to receive advice on the defined goals and needs you specify from the following areas:

1. Asset allocation advice;
2. Superannuation advice;
3. Advice on wealth protection (through the use of income, trauma or life insurance);
4. Retirement planning advice; and
5. Redundancy/early retirement advice.

The SOA prepared under this service will address the specific needs and goals you have requested advice on. However, because of the Service's streamlined nature it cannot provide all the scope of the Financial Planning Service. Specifically, the Defined Advice Service does not offer any ongoing services or reviews after implementation. Neither does it offer advice on estate planning or taxation issues.

Insurance service

Gold Financial provides a range of personal risk insurance products including Life, Total and Permanent Disability, Income Protection and Trauma.

Gold Financial's Insurance Service allows you to seek professional advice on your life, disability and trauma needs.

Execution only service

The Execution Only Service enables you to invest in a wide range of products from fund managers. Where no advice is provided and a SOA is not issued. Gold Financial will require a Letter of Authorisation from you before we are able to provide you with this service.

DO ANY RELATIONSHIPS EXIST WHICH MIGHT INFLUENCE YOU IN PROVIDING ME WITH FINANCIAL SERVICES?

Gold Financial owns shares in GIS Concepts and Tranzact. Gold Financial also shares a similar management team with GIS Concepts.

All authorised representatives of Gold Financial are also shareholders of Gold Financial, consequently your adviser will also own shares in GIS Concepts and Tranzact. Gold Financial may receive dividends from any of these companies if their operations are profitable and participate in the capital growth of its shareholding. Certain authorised representatives also have direct shareholdings in both GIS Concepts and Tranzact.

Gold Financial may receive payments from various product suppliers. These payments are between 0% and 0.25% per annum of your investment or in the case of risk products 0% and 5% of your premiums. These may be paid for as long as you hold the product. Gold Financial's authorised representatives do not receive any of these payments. Gold Financial uses these payments to subsidise the cost of conferences and training or professional development for its representatives. Product suppliers receive a range of benefits including being recognised as a sponsor, attendance at conferences and the right to make speaking/training presentations to advisers.

Your adviser may receive benefits (e.g. lunches, tickets to sporting events, etc) from product suppliers. Please refer to the adviser profile and SOA for details, if applicable. Your adviser and Gold Financial maintains a conflict of interest register and a soft dollar register which lists any alternative forms of payment or benefits that may be received that is valued in excess of \$300. If you wish to inspect the Register or ask any questions about this, please contact your adviser.



WILL I BE GIVEN ADVICE THAT IS SUITABLE TO MY NEEDS AND FINANCIAL CIRCUMSTANCES?

Yes. But to do so your adviser will need to ascertain your individual financial objectives, financial circumstances, needs and requirements before he/she recommends any financial products or services to you.

You have the right not to divulge this information to us if you do not wish to do so. In that case, your adviser is required to warn you about the possible consequences of not providing your full personal information. *You should take notice of these warnings.*

WHAT SHOULD I KNOW ABOUT ANY RISKS OF THE FINANCIAL PRODUCTS OR STRATEGIES YOU RECOMMEND TO ME?

Your adviser will explain to you any significant risks of financial products and strategies that are recommended to you. If you feel that you need further clarification, please ask your adviser.

WHAT INFORMATION DO YOU MAINTAIN IN MY FILE AND CAN I EXAMINE MY FILE?

Your adviser maintains a record of your personal profile, which includes details of your financial objectives, financial circumstances, needs and requirements. Gold Financial is committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information. Please refer to our privacy policy below.

If you wish to examine your file, you should contact your adviser and he/she will make arrangements for you to do so.

CAN I PROVIDE YOU WITH INSTRUCTIONS FOR YOU TO BUY OR SELL MY FINANCIAL PRODUCTS?

Yes. You may specify how you would like to provide us with instructions, for example by telephone, fax, email or other means.

WHO CAN I COMPLAIN TO IF I HAVE A COMPLAINT ABOUT THE PROVISION OF THE FINANCIAL SERVICES TO ME?

If you have a complaint about the service provided to you, you should take the following steps:

1. Contact your adviser and tell your adviser about your complaint.
2. If your complaint is not satisfactorily addressed within three (3) days, please contact the Compliance Manager, Gold Financial Pty Ltd, Level 6, 369 Royal Parade, Parkville, Vic 3052 or phone (03) 9348 2619, or put your complaint in writing and send it to Gold Financial at the above address. We will try to resolve your complaint quickly and fairly.
3. If your complaint cannot be resolved to your satisfaction within 45 days, you have the right to present your complaint to the Financial Ombudsman Service Limited, (FOS). FOS can be contacted on 1300 780 808. This service is provided to you free of charge. Gold Financial is a member of FOS.

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

GOLD FINANCIAL'S PRIVACY POLICY

At Gold Financial we recognise that your privacy is important. We are bound by, and committed to supporting, the National Privacy Principles (NPP) of the Privacy Act. The information set out below is largely a summary of our obligations under the NPP.

Collection

Our main purposes for collecting personal information are to:

1. Facilitate financial planning, financial products or services, insurance policies or related services;
2. Update our records; and
3. Satisfy legislation including the Financial Transactions Reports Act (FTR) and the Anti-Money Laundering and Counter Terrorism Financing Act (AML/CTF).

At or before the time we collect personal information from you we will take reasonable steps to inform you why we are collecting that personal information, who else we might disclose that personal information to and what may happen if you do not provide personal information to us.

The FTR and AML/CTF may require us to:

1. Ask you for information to check your identity (e.g. by referring to your driver's license, birth certificate or passport);
2. Provide details of certain financial transactions including certain cash transactions to AUSTRAC (www.austrac.gov.au); and
3. Pass this information on to product suppliers.

If you do not provide certain personal information we may not be able to provide you with the product or service you want.

Use and disclosure

We are subject to certain legislative and regulatory requirements that necessitate us obtaining and holding detailed information that personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advisory service is dependent on us obtaining certain personal information about you, including:

- employment details and employment history;
- details of your financial needs and objectives;
- details of your investment preferences and aversion or tolerance to risk;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure etc;
- information about your employment history, employment circumstances, family structure, commitments and social security eligibility;
- any other relevant information including medical history; and
- reports required for the purposes of risk insurance.



Gold Financial may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. You may, by contacting us request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

Data quality

We are required to collect sufficient information to ensure appropriate advice can be given for recommendations made to our clients. If you elect not to provide us with the personal information you may be exposed to higher risks for the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you.

Data security

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure. We will not retain any of your information for any longer than it is required by us, except to satisfy legal requirements. We will destroy or de-identify your personal information when it is no longer required.

Openness

We may use and disclose personal information for the purposes for which it was provided or secondary purposes in circumstances where you would reasonably expect such use or disclosure.

We may disclose personal information to third parties or external contractors carrying out functions and duties for and on our behalf. It is a condition of our agreement with each of our external contractors that they adhere to this privacy policy.

The information we collect from you may also be disclosed to third parties if the disclosure is required by or permitted by law.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business goes ahead, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

Access and correction

You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the formulae or process or explanation of that result.

We reserve the right to charge a fee for searching for and providing access to your personal information. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

Identifiers

In some circumstances we are required to collect government identifiers, for example, your Tax File Number. We will not use or disclose this information other than when required to do so by law or, when consented to by you.

Anonymity

You may deal with us anonymously where it is lawful, practical and reasonable to do so.

Privacy complaints

If you wish to complain about any breach or potential breach of our privacy policy or the National Privacy Principles, you should contact us and request that your complaint be directed to the Complaints Manager. Your complaint will be considered within seven days and responded to accordingly. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

PROFESSIONAL INDEMNITY INSURANCE

Gold Financial maintains an appropriate level of professional indemnity insurance as required by the Australian Securities and Investments Commission. Gold Financial's professional indemnity policy extends to cover claims in relation to the conduct of representatives/employees who no longer work for us (but who did at the time of the relevant conduct).

GENERAL DISCLAIMER

This Document has been prepared for the general information of investors and does not take into account the investment objectives, financial situation and particular needs of any particular person. You should seek professional advice when considering investments or strategies in the light of your particular investment needs, objectives and financial circumstances prior to acting upon any information contained in this Document.

While reasonable care has been exercised and the statements contained herein are based on information believed to be accurate and reliable, neither Gold Financial Pty Ltd - AFS Licence No. 291389, nor its directors, employees, agents or Authorised Representatives shall be liable (unless otherwise required by law) for any loss or damage suffered or caused to any person or corporation resulting from or contributed to by any error or omission from such statements including any loss or damage caused by any fault or negligence on the part of Gold Financial Pty Ltd or otherwise.