

Smith Coffey Pty Ltd

A.C.N. 008 819 458

as trustee for the Bon Unit Trust

Australian Credit Licence/Australian Financial Services Licence No: 237972

A.B.N. 72 940 948 949

Smith Coffey Securities Pty Ltd

A.C.N. 008 812 208

Australian Financial Services Licence No: 237971

A.B.N. 19 008 812 208

Important Information

This document incorporates our Financial Services Guide (FSG) and Credit Guide (CG). It contains important information to assist you in deciding whether to use our services. It also provides the following information about the services offered by the above licensed entities, who are also referred to as 'Smith Coffey', 'we' and/or 'our':

- who we are and our contact details
- the services we are authorised to provide
- any remuneration we may receive
- how we collect and maintain your personal information
- how to make a complaint and our dispute resolution process



Financial Services Guide & Credit Guide.



smithcoffey

Smith Coffey

opened its doors in 1972. Since then, we have proudly helped thousands of individuals and businesses grow, manage and protect their wealth.

Specialising in the needs of medical and dental professionals, we offer a complete suite of services to help you achieve your financial and lifestyle goals.

The services offered by the Smith Coffey group include:

- Financial Planning
- Insurance
- Tax and Accounting
- Finance
- Portfolio Management
- Estate Planning
- Retirement Planning

Not Independent

While we will always seek to meet our legal obligations to act in our clients' best interests within the meaning of section 961B of the Corporations Act 2001, we do not fall within the definitions of "independent", "unbiased" or "impartial" under section 923A. The reason we do not fall within these definitions is because we give our clients the option to allow life insurance companies to pay us commissions for the services that we provide to our clients rather than for us to be required to directly invoice our clients and for our clients to be required to pay us directly. We remain committed to continue to give our clients this important choice.

Financial Services Guide (FSG)

What advice is Smith Coffey licensed to provide?

Smith Coffey Securities Pty Ltd holds an Australian Financial Services Licence (number 237971) enabling the provision of advice in relation to a wide range of financial products available in the marketplace including but not limited to investments and superannuation.

Smith Coffey Pty Ltd as trustee of the Bon Unit Trust holds an Australian Financial Services Licence (number 237972) enabling the provision of advice in relation to life insurance, risk and investment products inside and outside the superannuation environment.

Smith Coffey maintains an approved product list which can be supplied to you upon request.

Smith Coffey has approved the distribution of this FSG.

The type of advice and services we provide include:

- Savings and wealth creation strategies to help you achieve financial independence;
- Structuring your investments for optimal tax effectiveness and flexibility;
- Protecting your assets and income through personal insurances; and
- In-house asset administration via our Personal Portfolio Service.

It is important that we understand your personal investment objectives, financial situation and needs and that we obtain complete and accurate information before we make any recommendations. We will inform you if our advice is based on information that may be incomplete or inaccurate.

Documents you may receive

Before commencing any work, we will provide you with an Engagement Pack which encompasses comprehensive details in relation to the services we offer and our engagement process. You will need to sign this before services commence.

If you receive personal financial advice, this will usually be outlined in a Statement of Advice (SOA). The SOA will detail our advice, the information the advice is based on and detailed information about the fees, costs and other benefits we may receive as a result of the advice we have provided. We will also explain any significant risks relating to the recommended investments and strategies. If you do not fully understand these risks, please ask for more information before proceeding with our advice.

When providing further advice in relation to advice where we have previously provided you an SOA and in specific other circumstances, we may issue a Record of Advice (ROA) which is provided to you for authorisation. We will keep a record of any further advice we provide to you for at least seven years.

If you receive further advice from us and a Record of Advice (ROA) has not been provided, you may request a copy of the record of that further advice. To request a copy, please contact your Consultant or our Compliance Manager using the contact details provided in the 'How do you make a complaint?' section of this document.

If we recommend you invest or purchase a financial product other than a financial product traded on a licensed market such as the ASX, we will also provide you with a Product Disclosure Statement (PDS). The PDS sets out important information of the recommended product that you should consider before deciding to purchase the product, including its benefits, risks, costs and other features.

You should read any warnings contained in your SOA, ROA and the PDS carefully before making any decision relating to a financial strategy or product.

What remuneration do we receive?

Smith Coffey's remuneration depends upon the services we provide to you. Smith Coffey may receive:

- Fees for service
- Ongoing advice fees
- Commissions paid by insurance providers

Details of any fees, commissions or benefits relevant to the advice provided will be disclosed in your SOA or ROA when personal advice is given.

Superannuation and Investment Services

1. Statement of Advice Fee

Initial Superannuation and/or Investment advice will involve the preparation of a Statement of Advice and the fees for preparing this advice are as follows (inclusive of GST):

Area of advice	Medical Student	Intern	Second Year	Registrar	Specialist
Superannuation	\$0	\$275	\$495	\$825	\$1,650
Investment	\$0	\$275	\$495	\$825	\$1,650

Statement of Advice Fees are waived when you implement the recommended advice through Smith Coffey within 6 months of the date of that advice.

2. Ongoing Review and Advice Fee

Fees for ongoing advice relating to investments are currently at a maximum of 1.210%.

3. Management Fees (only applicable to the Personal Portfolio Service)

If you use Smith Coffey's Personal Portfolio Service (PPS) to administer investments, the following fees apply:

- Administration fees to a maximum of 0.88%pa on the on-going value of your investments, payable monthly in arrears.
- Transaction fees of \$19.25 on all transactions involving the purchase, sale, transfer, placement and share rights issue.

Personal Risk Management

1. Statement of Advice Fee

Initial Personal Risk Management advice will involve the preparation of a Statement of Advice and the fees for preparing this advice are as follows (inclusive of GST):

Area of Advice	Medical Student	Intern	Second Year	Registrar	Specialist
Personal Risk Management	\$0	\$275	\$495	\$3,300	\$5,500

Advice Preparation Fees will be waived when you implement the recommended advice and your policy remains in force with Smith Coffey as the nominated adviser for a period of at least 2 years. The SOA fee will be charged if you do not implement the advice within 6 months of the date of the advice.

2. Cost to Implement Advice

All insurance providers are able to include (in an insurance premium) costs relating to product distribution. Insurance advisers receive this as Commission. Under the Corporations Amendment (Life Insurance Remuneration Arrangements) Act 2017 Commissions for the year commencing 1 January 2019 are restricted to (inclusive of GST):

Hybrid Commission 66% of initial premiums and 22% of ongoing premiums
 Level/Flat Commission 30.25% of initial and ongoing premiums

Commissions continue for as long as the policy remains in effect but they are not a payment for ongoing services. If you require us to complete a review of your circumstances, the advice preparation fee may apply. We will obtain your consent for that fee prior to commencing further advice.

What remuneration do our Representatives receive?

Representatives of Smith Coffey receive a salary for the services they provide. They may also receive a discretionary bonus from Smith Coffey based on set criteria that includes generating new business, delivering the services to existing client relationships, working on business improvements for efficiency and then meeting the Group's expectations on Behaviors', Compliance and Profitability.

Representatives of Smith Coffey may also receive alternative forms of remuneration such as the provision of training or professional development sessions. Smith Coffey maintains a register that records alternative forms of remuneration which it receives. This register will be provided to you if requested.

Representatives who are also owners of the Smith Coffey Group of companies receive distributions in accordance with their relevant shareholdings.

Referral fees

We do not make payments to individuals or companies who refer clients to us. You may be referred to an external specialist to receive further advice, however no referral fees or commissions are paid to any individual or company within the Smith Coffey Group.

How can you give us instructions?

You can provide us with information when meeting with your Consultant, or by telephone, or email. However, we generally only act on written instructions.



Credit Guide (CG)

What service is Smith Coffey licensed to provide?

Smith Coffey holds Australian Credit Licence No. 237972 and provides credit assistance in accordance with the National Consumer Credit Protection Act 2009. Smith Coffey is responsible for the advice and conduct of its staff and credit representatives.

A description of the credit services Smith Coffey provides

Under the National Consumer Credit Protection Act, we must not provide credit assistance to you if the credit contract is unsuitable. The contract will be unsuitable for you if, at the time the contract is entered into or the credit limit is increased, it is likely that:

- you will be unable to comply with your financial obligations under the contract, or could only comply with substantial hardship; or
- the contract will not meet your requirements or objectives.

We must make an assessment whether the contract will be unsuitable for you before entering into a credit contract with you or increasing the limit of an existing credit contract. This means that we will prepare a preliminary assessment. This includes asking you questions and obtaining information from you such as:

- your financial requirements and objectives which includes:
 - o the purpose of the loan you are seeking
 - o the amount of credit you are seeking
 - o the term of the loan you are seeking
 - o the loan features you require
- your personal and financial information such as:
 - o your employment status and income
 - o your dependants (if any) and family planning
 - o your existing assets and liabilities
 - o your expenses and your surplus cash flow

You can request a copy of our preliminary assessment. If you ask for one, we must give you a copy (at no charge to you).

Reminder



Home Building Insurance / Home Contents Insurance

Before you sign a contract of sale, always consider purchasing home building insurance with a general insurance provider to immediately safeguard the value of your new property.

Similarly, always consider taking out home contents insurance prior to settlement and before you move your valuable possessions to your new home.

Parties that Smith Coffey are associated with

Smith Coffey Pty Ltd sources loans from Westpac Banking Corporation ("Westpac"). Westpac is a Credit Provider that will assess your application and if approved, offer you finance.

Smith Coffey Pty Ltd is associated with ProLoan (Aust) Pty Ltd ("ProLoan"). ProLoan facilitates our relationship with Westpac and provides access to a credit policy tailored for medical professionals. While Smith Coffey assesses client needs in our own right and benchmarks, our decision to consider Westpac loans is aligned with the ProLoan referral network's focus on this credit provider. ProLoan's arrangements with Westpac may influence the specific lending solutions available and the remuneration structures associated with those solutions."

What remuneration do we receive?

Smith Coffey generally does not charge a fee for our services but under unique circumstances we may charge up to \$16,500 (inc. GST) and the specific amount will be provided in a Quote. If Smith Coffey intends to charge you a fee for the provision of credit assistance, we will ask for your acceptance of the stated fee, before providing credit assistance to you.

Smith Coffey will receive initial commission on the implementation of your credit contract, which is calculated as a percentage of the credit amount. The amount will depend on the credit provider but could be up to 0.715 (inc. GST). The estimated dollar amount will be provided to you in a Proposal at the time of providing the credit assistance.

Smith Coffey will also receive ongoing commission on the credit contract. The amount will depend on the credit provider but could be up to 0.275%pa (inc. GST) of the credit balance. The estimated dollar amount will be provided to you in a Proposal at the time of providing the credit assistance.

For credit services where personal advice is not given and remuneration is not ascertainable at the time this Credit Guide is provided, clients may request particulars of the remuneration within a reasonable time after receiving this Credit Guide and before any further credit service is provided.

What remuneration do our Credit Representatives receive?

Credit representatives of Smith Coffey Pty Ltd receive a salary for the credit assistance they provide. Credit representatives may also receive a discretionary bonus from Smith Coffey based on set criteria that includes generating new business, delivering the services to existing client relationships, working on business improvements for efficiency and then meeting the Group's expectations on Behaviors, Compliance and Profitability.

In some limited cases, such as providing credit assistance to family or friends, credit representatives may receive some of the upfront and trail commission paid by Westpac to ProLoan or from other credit providers. The value of these benefits cannot be ascertained.

Credit representatives of Smith Coffey Pty Ltd may also receive an indirect benefit in the form of training or professional development provided by ProLoan and other credit providers. The value of these benefits cannot be ascertained.

Referral fees

Smith Coffey does not pay a referral fee for third party referrals.

Terms and Conditions

Should you engage us to provide credit broking services to you that result in an application for finance, the following explains the responsibilities of Smith Coffey, your credit provider and you in the application process.

Your responsibilities

- You authorise Smith Coffey to assist in arranging finance for you based on the information provided by you, your accountant and your legal and financial advisers.
- To help Smith Coffey assist you with your application for finance, you must provide Smith Coffey with accurate, full and clear instructions and all relevant documents, act promptly and let Smith Coffey know as soon as practicable after there is a change in your circumstances.

Smith Coffey's responsibilities

- As a Credit Broker, Smith Coffey has no control over the success or otherwise of any finance application they assist you with. Approval of any finance application is solely at the discretion of the credit provider.
- Smith Coffey is not liable for any claim, loss or damage incurred or suffered by you or any other relevant persons as a result of:
 - (i) any delay with the approval of your finance application;
 - (ii) incorrect or incomplete transmission or any error in any application which has arisen directly or indirectly in connection with or as a result of an act or omission by you, your accountant and/or your legal and financial advisers;
 - (iii) failing to assist in arranging finance for you; and
 - (iv) any action, representation, warranty or recommendation made by the credit provider to you.

Your Credit Provider's responsibilities

- Your credit provider is responsible for preparing and providing you with the documentation for the finance Smith Coffey assists in arranging for you. You should read the documentation carefully and seek independent legal and taxation advice before you enter into any finance contract.

These terms and conditions may be varied by written agreement between you and Smith Coffey.

FSG and CG Information

Your information and rights to privacy

Smith Coffey collects and maintains records of your personal information so that we can provide you with advice and other services appropriate to your needs. You have the right to withhold personal information however it may prevent us from providing advice and other services that are suitable to your requirements.

The personal information we collect may include your name, contact details, age, financial details and other information that is relevant to the services we provide to you, or necessary to carry out your instructions. When you provide Smith Coffey instructions to provide you with financial services or credit services you will be asked to consent to the collection and disclosure of your personal information to Smith Coffey and its professional and administrative services providers, including those located in offshore jurisdictions. If you do not consent, we may not be able to provide you with some or all of the services you are seeking.

Our Privacy Policy and where applicable, our Credit Reporting Policy, details how your personal and credit information and the procedures we follow when collecting, storing, using or disclosing your personal information.

We encourage you to review these documents, which include our Privacy Consent, before proceeding. Please ask your Consultant if you need another copy.

You have the right to review the information maintained by Smith Coffey, please speak to your Consultant if you would like to review your file.

We have an obligation under the Anti-Money Laundering and Counter Terrorism Financing Act to verify your identity and the source of any funds. We assure you that where we retain copies of any documents such as drivers licence and/or passport they will be kept securely.

Complaints Policy

Smith Coffey values your feedback. We understand that issues might arise from time to time that can cause our clients dissatisfaction. If at any time you are dissatisfied with us or our services, please contact and provide us with your concerns and feedback, and allow us the opportunity to remedy the matter where this is appropriate and possible.

How do you make a complaint?

You can provide us with your feedback or complaint by contacting us as follows:

To:	The Compliance Manager
Address:	20 Nicholson Road SUBIACO WA 6008
Postal Address:	PO Box 268 SUBIACO WA 6904
Telephone:	9388 2833
E-mail:	complaints@smithcoffey.com.au
Web Address:	www.smithcoffey.com.au

Whichever lodgement method you choose to lodge your complaint, please provide us with your full name, contact details and as many details as possible regarding your complaint.

If you are experiencing difficulties and need additional assistance/support in lodging your complaint, please contact the Compliance Manager, who will help you work through our complaints process.

How will we treat your complaint?

When we receive your complaint, we will:

- acknowledge your complaint within one business day of receipt or as soon as reasonably practicable;
- assess and investigate the matter(s) raised in your complaint; and
- provide you with a written response that will explain our investigation, decision, and reasons for our decisions once our investigation is complete.

How long will it take us to treat your complaint?

Generally, we will provide you with a response no later than 30 calendar days after receiving your complaint.

In some cases, a different time frame may apply where the resolution of your complaint is particularly complex, or there are circumstances beyond our control causing complaint management delays. Where this is the case, we will provide you with a delay notification which will inform you of the reasons for the delay and your rights to escalate the matter to the Australian Financial Complaints Authority (**AFCA**) if you are dissatisfied.

How to access and contact AFCA?

We are a member of AFCA. AFCA is an independent dispute resolution scheme available to consumers. If we have not resolved your complaint to your satisfaction or issue you with a delay notification, you can lodge your complaint with AFCA.

AFCA contact details:

Postal Address:	GPO Box 3, Melbourne VIC 3001
Telephone:	1800 931 678 (free call)
E-mail:	info@afca.org.au
Web Address:	www.afca.org.au

Other services

Smith Coffey is also a registered tax agent and can therefore offer Tax & Accounting Services to clients through Smith Coffey Tax & Accounting Pty Ltd. As our main focus is to work with you to develop a strategy to provide you with true long-term growth and security, this can only be realistically achieved through our coordinated advice approach via the other services we provide. As such, we only offer Tax & Accounting services if you also engage with Smith Coffey for Financial Planning and/or Credit Assistance. In that regard, should you terminate all Financial Planning/Credit Assistance services through Smith Coffey, we will also terminate Tax & Accounting Services.

Services Smith Coffey does not provide

Real Estate Advice

Whilst we are able to assist with financing the acquisition of property and can provide taxation and some generic strategy and structuring advice relating to property transactions, we are not licensed real estate agents, licensed valuers or licensed builders and do not profess to have specific expertise in directly held real estate.

Where we provide generic information about the real estate market, we do so in terms of broad information related to generic financial strategy and structuring associated to and incidental to tax advice related to the property. Smith Coffey subscribes to a number of research houses that research the property market, including RP Data. We are happy to extract information from these research houses and provide them to you, to assist with your consideration of the issues raised by the research houses. Please note that any generic strategy and structuring advice and tax advice is provided to you as part of our service offering as accountants and registered tax agents – these services are specifically not financial services or credit services. As a consequence of this, none of the consumer protection provisions of the Corporations Act 2001, ASIC Act 2001 or the National Consumer Credit Protection Act 2009 (including free access to ASIC-approved external dispute resolutions schemes) apply to the generic strategy and structuring advice or tax advice services relating to real estate.

Direct Asset Advice

In addition to Real Estate, we do not provide advice on any other directly acquired assets (e.g. Collectables or Artwork).

General Insurance Advice

We do not provide general insurance advice (e.g. home, contents, motor vehicle). We recommend that you contact a specialist to assist with reviewing your general insurance arrangements.

Professional Indemnity Insurance

Smith Coffey maintains a Professional Indemnity insurance policy which complies with section 912B and regulation 7.6.02AAA of the Corporations Act 2001, as well as section 48(1) of the National Consumer Credit Protection Act 2009 and Regulation 12 of the National Consumer Credit Protection Regulations 2010, covering claims in relation to the conduct of Smith Coffey representatives and employees."

Credit Assistance - Frequently Asked Questions

Our Services

Smith Coffey Pty Ltd is registered to provide credit to clients under our Australian Credit License 237972 and we are a member of MFAA.

Is Smith Coffey a Finance Broker?

Yes. Smith Coffey can offer finance broking services to clients.

Can Smith Coffey provide direction, suggestions or comparisons for loans or facilities I have with other banks?

Yes. Smith Coffey and its Representatives can provide information about loans and facilities offered by a range of Lenders.

We chose the credit providers based on research and your objectives. We are a finance broker and can offer credit services for a range of service providers as follows:

- Allianz Insurance
- AMP
- ANZ
- Bankwest
- Commonwealth Bank
- ING
- Macquarie Bank
- NAB
- Westpac

Collection of Information & Assessment

We and our representatives must provide you with credit assistance that is not unsuitable for your financial situation and objectives. To do this a preliminary assessment must be conducted. For our representative to conduct this assessment they must collect information about your financial situation and the objectives you have for seeking credit. If you do not provide the requested information we may not be able to provide any credit assistance to you. You can request a copy of the preliminary assessment conducted by our representative within 7 years of the date that the written quote was provided to you for credit assistance. If you make the request within 2 years of the written quotation we will provide a copy of the assessment within 7 business days.

If the request is made after 2 years but before the end of 7 years we will provide the copy within 21 business days. If you make the request after 7 years have passed, we are not obligated to retain a copy so we may not be able to provide it to you.

PAYMENT FOR SERVICES

We are remunerated by a combination of fees charged directly to you and commissions received from the credit providers with whom you take the credit contract with. The details are set out below.

FEES

We may charge a fee based on an hourly rate. For example, if the assistance we provide you took 2 hours at a rate of \$330/hour our fee would be \$660 (Inclusive of GST). Our representatives receive a salary.

COMMISSIONS

The credit providers that we recommend to you pay us a commission calculated as a percentage of the amount of credit you receive. There is an initial commission of up to 0.715% which is received on settlement of the loan. There is also an ongoing commission of up to 0.275% per annum of the outstanding balance of the loan which is paid to us monthly.

EXAMPLE

	UPFRONT	ONGOING
Loan amount (\$100,000)	\$715	\$275pa

Smith Coffey Pty Ltd will provide in writing, disclosure of any commissions, fees, and other benefits or payments we may receive.

How do I know that the loans and facilities are in my best interests?

Smith Coffey and its employees conduct a thorough review with you to determine your Objectives, Cashflow and borrowing capacity. We will require you to provide relevant personal and financial information about your personal circumstances as they are now and as they may be in the future. We will then make a preliminary assessment to ensure the credit contract will not be unsuitable for you, and that it meets your needs. You can request a copy of our preliminary assessment.

