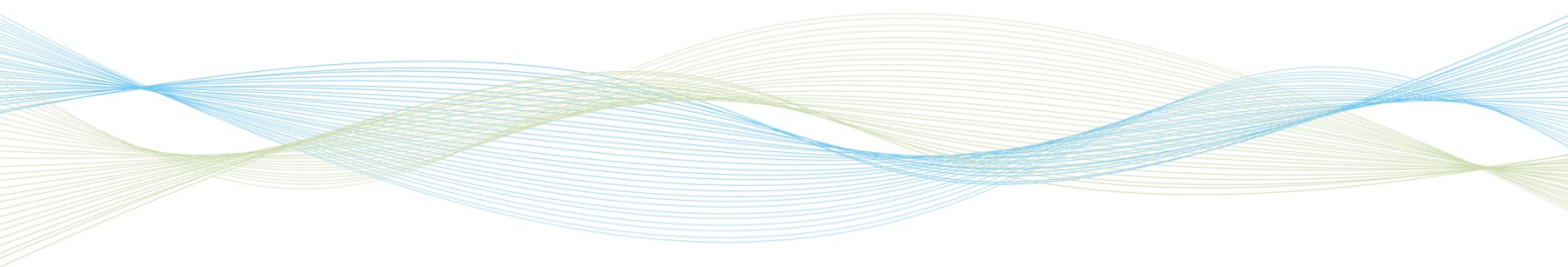


Financial Services Guide

Version 15

Date: 1st April 2020



Important Information about our Licensee

Financial Services Guide

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you
- how we and our associates are paid and any other benefits we may receive
- any potential conflicts of interest we may have
- how we protect your privacy and handle your personal information
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA).

This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the "Contact us" section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain

circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the "Contact us" section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.

About our Licensee

We are authorised representatives of Apogee Financial Planning Limited ABN 28 056 426 932, Australian Financial Services Licence Number 230689 ("Apogee Financial Planning") of Level 1, 105-153 Miller Street, North Sydney NSW 2060.

Apogee Financial Planning is recognised as one of Australia's leading financial advice networks, with approximately 140 experienced financial planners across Australia managing over \$5 billion of investments.

Apogee Financial Planning is a professional partner of the Financial Planning Association, the professional body representing qualified financial planners in Australia, and therefore adheres to set standards in terms of ethics, conduct and continuing professional development.

Our associations and relationships

Apogee Financial Planning is part of the National Australia Bank Limited ("NAB") group of companies ("NAB Group"). Apogee Financial Planning is a wholly owned subsidiary within the NAB Group. As the NAB Group is an issuer of financial products, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice)

Apogee Financial Planners are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited).

These include products and services with the following branding:

- NAB, National
- MLC

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- JANA
- JB Were
- Plum
- Pre-Select Funds
- Private Investment Consulting
- WealthHub Securities
- Altrinsic Global Advisers
- Antares Capital
- Fairview Equity Partners
- Intermede Investment Partners
- Presima Inc
- Redpoint Investment Management

If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on Apogee Financial Planning's approved product list. These will include NAB Group products. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests. You can view a copy of our approved product list on the Apogee website (apogee.com.au).

NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by Apogee Financial Planning or its authorised representatives.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

About us

Who we are

Altus Financial is a fully integrated advice centre incorporating chartered accountancy, wealth management and business advisory services. Our aim is to be the only place you'll ever need to go for the right financial solution. Whether you're looking to maximise your business position, your personal finances or both we give you the perfect combination of advice tailored to suit your needs alone.

No matter what stage of life you're at, or how long you've been in business, we'll help you get the most from your finances so that everything flows just the way you want it.

The Financial Services that the above advisers offer are provided by Altus Financial Pty Limited 62 081 162 843 Authorised Representative (AR) No. 242352.

The following financial advisers are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of Apogee Financial Planning:

Rod Dickinson

Authorised Representative No is 242238. He has a degree in Economics and a Diploma of Financial Planning. Rod Dickinson is a member of the Financial Planning Association. Rod Dickinson is an Authorised Representative of Apogee Financial Planning Limited.

Matthew Smith



Authorised Representative No 242317. He has a degree in Economics, a Diploma in Business and a Diploma of Financial Planning. Matthew Smith is a member of the Financial Planning Association. Matthew Smith is an Authorised Representative of Apogee Financial Planning Limited.

Adam Montana



Authorised Representative No 328516. He has a degree in Economics, and a Graduate Diploma of Financial Planning. Adam Montana is a member of the Financial Planning Association. Adam Montana is an Authorised Representative of Apogee Financial Planning Limited.

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Apogee Financial Planning has authorised us to provide you with this Financial Services Guide.

What we do

We are authorised by Apogee Financial Planning to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management
- Managed Discretionary Accounts

and to provide financial advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Derivatives
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

Managed Discretionary Account Services

Apogee Financial Planning Limited offers Managed Discretionary Account (MDA) Services through an agreement with clients called a MDA Contract.

By accepting the terms of a MDA Contract, you will be granting your adviser an authority to take action on your investment portfolio (e.g. buy or sell investments) without first consulting you.

This will change the nature of the adviser-client relationship.

Normally, your adviser provides you with advice and recommendations supported by research or other information to assist you to make an informed decision on those recommendations. Your adviser then implements whatever action you decide to take.

If you accept the terms of an MDA Contract, you will, to some degree depending on the limitations/restrictions detailed in the MDA Contract, provide your adviser with the authority to make decisions on your investment portfolio and to implement investment transactions without consulting you.

You may give instructions to your adviser that on how rights relating to the financial products in your investment portfolio are to be exercised by providing those instructions to your adviser in writing.

The decision to surrender full or partial control of your investment portfolio to your adviser is an important decision.

You should not accept the terms of a MDA Contract provided by your adviser unless you are confident that he/she has a clear understanding of your circumstances, needs and objectives.

The significant risks of accepting the terms of a MDA Contract provided by your adviser are:

Your adviser may make investment decisions that you disagree with. Provided your adviser's actions are within the law and the scope of the authority you have granted and the adviser has acted efficiently, honestly and fairly, you will have no right of recourse.

This means that you will have to accept the tax consequences, transaction costs and any capital loss resulting from any transaction validly executed by your adviser and any "reversal" of that transaction that you may request.

If you do not promptly inform your adviser of any changes in your situation, needs and objectives, there is a risk that your adviser may make inappropriate investment decisions.

You may only enter into a MDA Contract where your investment portfolio is held via a regulated platform such as an investor directed portfolio service (IDPS), IDPS-like scheme, superannuation wrap or master trust. The assets that will be managed under the terms of your MDA Contract will be held as part of your account on the relevant platform, and the MDA services does not include custodial or depository services.

You must enter into the MDA Contract provided by your adviser before he/she can provide you with MDA services. Your MDA Contract will include an Investment Program prepared by your adviser that complies with Division 3 of Part 7.7 of the Corporations Act, and that will contain:

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- Statements about the nature and scope of the discretions your adviser will be authorised and/or required to exercise under the MDA Contract and the investment strategy that is to be applied in exercising those discretions;
- Information about any significant risks associated with the MDA Contract;
- The basis upon which your adviser considers the MDA Contract to be suitable for you; and

Warnings that the MDA Contract:

- May not be suitable to you if you have provided limited or inaccurate information relating to your relevant personal circumstances; and
- May cease to be suitable if your relevant personal circumstances change.

Note that your adviser will exercise, on your behalf, all rights that relate to your portfolio arising from corporate actions and communications about your portfolio assets.

Your adviser will be responsible for reviewing the suitability of the MDA Contract (including the Investment Program that forms part of it) to your relevant personal circumstances at least once every thirteen (13) months, unless the MDA Contract is terminated earlier.

Fees and Costs

The table below shows the fees and other costs that you may be charged. These fees and costs may be deducted from your money, from the returns on your investment or from the assets managed in connection with the MDA services.

You should read all the information about fees and costs because it is important to understand their impact on your investments managed in accordance with the MDA services.

Managed Discretionary Account		
Type of fee or cost	Amount	How and when paid
Fees when your money moves in or out of the managed investment product		
Establishment fee The fee to open your investment	Nil	Not Applicable
Contribution fee¹ The fee on each amount contributed to your investment	Nil	Not Applicable
Withdrawal fee¹	Nil	Not Applicable

Managed Discretionary Account

The fee on each amount you take out of your investment		
Exit fee¹ The fee to close your investment	Nil	Not Applicable
Management costs The fees and costs for managing your investment ¹		
MDA advice fee	Nil	Nil
Service fees²		
Switching fee The fee for changing investment options	Nil	Not Applicable

1. This fee includes an amount payable to an adviser.

2. Refer to the 'How we charge for our services' section.

Example of annual fees and costs for Altus Exchange Portfolio.

This table gives an example of how the fees and costs for the Altus Exchange Portfolio can affect your investment over a 1 year period. You should use this table to compare this product with other similar investment products.

Example — MDA service		Balance of \$50,000 with a contribution of \$5,000 during year
Contribution Fees	Nil	For every additional \$5,000 you put in, you will be charged \$0.
PLUS Management Costs	Nil	And, for every \$50,000 managed under the MDA service, you will be charged \$0.00 each year
EQUALS Cost of MDA service		If you had an investment of \$50,000 at the beginning of the year and you put in an additional \$5,000 during that year, you would be charged fees of \$0.00. What it costs you will depend on the investment option you choose and the fees you negotiated.

This example is illustrative only and fees and costs may vary for your actual investment. This example only shows the fees and costs that relate to receiving the MDA services, which can only be received in connection with your platform account. The example does not include the fees and costs of the underlying investments acquired through that platform.

Additional costs will be charged by the issuers of the products that may be acquired as part of your MDA service via your platform account. Refer to the disclosure document for your platform for an explanation of the fees payable in connection with your platform account.

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Did You Know?

Small differences in both investment performance and fees and costs can have a substantial impact on your long term returns.

For example, total annual fees and costs of 2% of your account balance rather than 1% could reduce your final return by up to 20% over a 30-year period (for example, reduce it from \$100 000 to \$80 000).

You should consider whether features such as superior investment performance or the provision of better member services justify higher fees and costs. You may be able to negotiate to pay lower contribution and management costs where applicable. Ask the fund or your financial adviser.

To Find Out More

If you would like to find out more, or see the impact of the fees based on your own circumstances, the Australian Securities and Investments Commission (ASIC) website (www.moneysmart.gov.au) has a managed funds fee calculator to help you check out different fee options.

This FSG complies with the relevant requirements of ASIC Class Order 04/194 'Managed discretionary accounts'.

Financial Product Advice Areas We Are Not Authorised to Provide

Rod Dickinson, Matthew Smith and Adam Montana are not authorised by Apogee Financial Planning to provide financial product advice in the following financial products:

- General Insurance Products
- Private Health Insurance

We are not authorised to provide any other financial services or financial products on behalf of Apogee Financial Planning.

Where we are unauthorised to provide you with a financial service or financial product that you are interested in, we will advise you of this and refer you to an alternative source of advice.

Corporate Superannuation Fund - Trustee Arrangements

Where we assist you in relation to a corporate superannuation fund we may receive a payment from the fund Trustee or Administrator, for services we provide to the employer sponsor and/or members within participating corporate super funds. The

payment is based on the number of members within the relevant corporate plan.

Where these arrangements are in place, there are some restrictions on the type of advice we can provide you and in some cases we may be unable to provide you advice as to whether to join or consolidate your super into the fund. Where we can provide you with advice we will provide further information about the limitations and any potential Trustee payments in our Statement of Advice.

Contact us

For more information on anything you have read in this FSG, to obtain a copy of our Privacy Policy or if there is anything else we can help you with, please contact us at:

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GPO Box 49

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P 02 8908 3444

F 02 8908 3455

mail@altusfinancial.com.au

Your Confidence In Our Advice

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

Phone: 1800 611 950

Email: advice.complaints@nab.com.au

In writing to:

Advice Dispute Resolution Team

Apogee Financial Planning

Level 2, 105-153 Miller Street

North Sydney NSW 2060

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the Australian Financial Complaints Authority (AFCA).

Website: www.afca.org.au

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Email: info@afca.org.au
Telephone: 1800 931 678 (free call)
In writing to: Australian Financial Complaints Authority
 GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Apogee Financial Planning holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by Apogee Financial Planning at the time of providing the advice, but are no longer authorised representatives of Apogee Financial Planning at the time of your complaint.

Payments and benefits we receive

You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a financial product provider when you commence an insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time.

Other payments we may receive

We will provide you with details of all fees, commissions or other benefits we may receive when we provide advice to you and,

where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Conferences

We may attend conferences and professional development seminars that have a genuine education or training purpose. Apogee Financial Planning, or our employer, may pay for the costs of our travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

We keep a register detailing certain non-monetary benefits that we receive e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting us. Please be aware that Apogee Financial Planning may charge you for the cost of providing this information to you.

Sponsorship

Apogee Financial Planning receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and Altus Financial do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

Referrals

If you have been referred to us or we refer you to someone else, we may have arrangements in place to or receive a referral fee, commission, or other benefit. Details of any arrangement will be provided in our advice to you.

Rod Dickinson and Matthew Smith are Directors of Altus Financial Pty Ltd and as a result will receive distributions and/or other benefits from Altus Financial Pty Ltd. Adam Montana is a Principal Client Adviser of Altus Financial Pty Ltd and as a result

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will receive distributions and/or other benefits from Altus Financial Pty Ltd.

Referrals from a third party

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Business Equity Valuation (BEV)

In the event of our death or permanent disablement, or if we were to leave the financial planning industry, Apogee Financial Planning provides a buyer of last resort option called BEV. This helps manage the transition of ownership to ensure you continue to receive advice.

In addition, we are part of a corporate structure and have a succession agreement in place to manage the transition of ownership should we leave the business.

Our business operates in a corporate structure. This model is less likely to be eligible for BEV as all the Principal Advisers in our business would have to either leave the industry, die, or become permanently disabled.

The value of a sale under BEV is based on a multiple of ongoing revenue received by the business on an annual basis. The multiple can range from 2.5 to 4 depending on the proportion of the ongoing revenue that comes from clients who hold MLC group financial products.

Here are some examples to help you understand the potential benefit to us of our clients holding MLC group product:

- If the ongoing revenue of the business was \$100,000 and 50% of our clients held MLC group products, the sale value for the financial planning business would be between \$250,000 and \$350,000;
- If the ongoing revenue of the business was \$100,000 and 85% of our clients held MLC group products, the sale value for the financial planning business would be up to \$400,000;

Importantly, BEV is subject to us meeting certain compliance requirements and standards.

How we charge for our services

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Initial consultation

At our expense: The aim of the initial consultation is for us to outline our services and to jointly decide whether you would benefit from our service offering. We do not charge a fee for the initial consultation, and we ask you to complete a short "Needs Analysis or Client Profile" prior to this meeting. At the end of the first interview, we will quote a fee for the provision of the following services. The fee will be based on the complexity and scope of the work undertaken.

Advice preparation and strategy presentation

If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice.

- Collation of Financial Records
- Preparation and Presentation of Statement of Advice

Your initial Advice Fee will range from \$2,750 - \$27,500 (Incl GST) depending on the level of complexity of your situation and the advice provided.

This fee will be quoted after your initial consultation in the form of a Professional Services Agreement (PSA) prior to you proceeding. For example, complex advice that contain multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation Funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum.

Implementation fee for advice

If you elect to pay us a fee for implementing the advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice:

This fee may range from \$0 - \$27,500 (Incl GST) depending on the level of complexity of your situation and the advice provided.

Borrowed funds – if we recommend you acquire investments using borrowed funds then your implementation fee may range from \$0 - \$27,500 (Incl GST).

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These fees may be paid by cheque, credit card (Visa, MasterCard or Bankcard), direct debit or collected as an investment product entry fee (see commissions on all products*). Credit card and direct debit payments include an administration fee of \$2 per transaction set up, \$1 per transaction plus a merchant fee of 0.86% for credit card transactions.

Insurance products

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$700 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

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an Australian Financial Services Licensee registered office 105-153 Miller Street North Sydney NSW 2016
Australian Financial Service & Credit Licensee 230689
Our liability is limited by a scheme approved under professional standards legislation, except where we are a financial services licensee



The relevant insurer will pay initial commission between 0% and 90% and ongoing commission between 0% and 33% of the annual premium for as long as you hold the product.

Commissions are paid to us by the product provider and are not an additional cost to you.

Ongoing fee for advice

If you elect to pay a fee for the ongoing review of your financial planning strategy, the ongoing fee is based on the complexity of ongoing advice and the services provided. The ongoing service fee for this package is \$2,750 (Incl GST) per annum (minimum fee) or a maximum of \$220,000 (Incl GST) of total funds invested.

Borrowed funds – if we recommend you acquire investments using borrowed funds then your ongoing fee may range from \$0 - \$27,500 (Incl GST).

The ongoing advice fee will be based on the level of service needed and the complexity of the advice. Complex advice requirements include the use of trusts and ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged.

Fixed Term Advice and Services Agreements

You can elect to enter into a 12 month Fixed Term Advice and Services Agreement as part of your financial planning strategy so you can receive advice services such as a meeting to review your plan. Details of the services will be set out in your 12 month Fixed Term Advice and Services Agreement.

The fee can range from a minimum of \$2,750 (Inc GST) while the maximum is \$220,000 (Inc GST). The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be outlined and agreed with you in the Agreement.

Borrowed funds – if we recommend you acquire investments using borrowed funds then your annual fee will be a minimum of \$2,750 (Inc GST) and a maximum of \$220,000 (Inc GST) pa.

Ad hoc and Ongoing advice

Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$165 and \$450 may apply.

Execution only service

Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of \$0 and a maximum of \$2,750 (Incl GST) fee may apply, unless otherwise agreed upon.

Margin loans

We do not receive commissions either directly or indirectly from any margin lending products.

Pre-existing arrangements

For existing clients already in an established commission arrangement, we may receive commission on investment products or margin lending products held. For investment products the relevant product issuer will pay initial commission between 0% and 5.5% and ongoing commission between 0% and 0.88% of the value of your investments for as long as you hold the product. For margin loans the relevant product issuer will pay an ongoing commission between 0% and 0.88% of the outstanding loan balance. Commissions are paid to us by the product provider and are not an additional cost to you.

Privacy Notification

How we manage your personal information

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification covers us and tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.

If you would like more information about our Licensee Apogee Financial Planning (and other members of the NAB Group), please also refer to Apogee Financial Planning Privacy Policy available at www.apogee.com.au/privacy.

Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal

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information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which

we use your information. This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including Apogee Financial Planning and other members of the NAB Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Apogee Financial Planning and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities)
- where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

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Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid;
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products);

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

Consent to marketing activity

We presume you consent to being contacted by us (including Apogee Financial Planning and other members of the NAB Group) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the 'Contact us' section of this FSG). We will process your request as soon as practicable.

Gaining access to your personal information

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

Correcting your Information

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal these complaints, by reading our Privacy Policy (or by contacting us) or by referring to the 'Your confidence in our advice' section of this FSG.

Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au

