

FINANCIAL SERVICES GUIDE

A guide to our relationship with you and others

Janahan Kumaralingam and Vostro Private Wealth Pty Ltd

Bespoke Wealth Pty Ltd ABN 61 689 804 626 is an Australian Financial Services Licensee (AFSL No. 700117 (**Licensee**)).

Address	Suite 6, Level 12, 350 Collins Street, Melbourne VIC 3000
Phone	0414 357 589
Email	admin@bespokewealthpartners.com.au

The Licensee appoints Authorised Representatives to act on its behalf for the provision of authorised financial services.

This Financial Services Guide (**FSG**) is provided by:

- Janahan Kumaralingam (Authorised Representative No. 405581); and
- Vostro Private Wealth Pty Ltd (Authorised Representative No. 471192)

(**we** or **us**).

The distribution of this FSG is authorised by the Licensee.

Not Independent

We are not "independent", "impartial" or "unbiased" in relation to the personal advice we provide. We are not permitted to use those or similar terms in accordance with section 923A of the *Corporations Act 2001 (Cth)*.

We are not independent because we are paid commissions by life insurers for life insurance policies arranged by us. Please refer to the sections on Fees in this FSG for further information on commissions we may receive.

Purpose of Financial Services Guide (FSG)

The purpose of this FSG is to inform you of our services and fees, and assist you when deciding whether to use those services.

This FSG includes information about:

- the financial services and products we provide;
- the advice and documents you may receive;

- your privacy and how we collect your personal information;
- what to do if you have a complaint;
- the significant relationships and associations we have;
- the remuneration and other benefits that may be received by us or other relevant persons in connection to the financial services we provide to you; and
- fees and charges for our services.

Financial services we provide

The Licensee authorises us to provide financial services including financial product advice (general and personal advice) and deal in financial products including:

- deposit and payment products; including:
 - o non-basic deposit products;
 - o non-cash payment products;
- government debentures, stocks or bonds;
- life products, including:
 - o investment life insurance products, and
 - o life risk insurance products;
- managed investment schemes, including Investor Directed Portfolio Services (IDPS);
- retirement savings accounts;
- securities;
- superannuation, including self-managed superannuation funds; and
- standard margin lending facilities.

In addition, we provide tax (financial) advice services, and access to a suite of professional services to assist with estate planning, wills, family trusts and companies. We also have relationships with a number of professionals, including lawyers, accountants and mortgage brokers who we can work with to help you achieve your goals.

Approved Product List (APL)

We can only provide advice on financial products that are on the Licensee's APL, a copy of which is available upon request. The APL includes a range of investment, insurance and superannuation products for us to choose from. The products on the APL have been selected by an independent

committee based on extensive research on a range of factors including performance, costs and risks.

Documents you may receive

In addition to this FSG, you will receive other important documents. Please refer to the following definitions for a description of the documents you are likely to receive:

Statement of Advice (SOA)

If we give personal financial advice to you, we will provide you with a SOA. We must give the SOA to you the first time we provide you with personal advice about financial products or where there has been a significant change in your circumstances.

We provide personal advice when we take your personal circumstances into account when providing the advice. Personal advice can be given on your complete financial situation or on limited areas you require advice on – we will discuss the scope of the advice before we start work.

We must give you the SOA before we provide any services to implement our recommendations. We have legal and ethical obligations to ensure that the advice and recommendations we provide to you are in your best interests.

The SOA will include the following information:

- our advice and the grounds for our recommendations;
- information about fees and commissions that may be received by us for the advice; and
- any associations, relationships or interests that may influence the advice we provide.

Where the personal financial product advice relates only to a basic deposit product, a non-cash payment facility that is related to a basic deposit product or travellers' cheques, an SOA will not be provided.

Record of Advice (ROA)

We may also record our advice through preparing a record of advice in some circumstances instead of providing you with another SOA. If you have not been provided with a copy of the ROA, you may request a copy of it free of charge at any time within seven years after the advice was provided to you, by contacting us.

Client Service Agreement

The Client Service Agreement will be tailored to your specific requirements and outlines the benefits, services and support we will provide you. It will contain terms and conditions for our fees and costs for providing and implementing our advice.

Product Disclosure Statement (PDS)

If we make a recommendation on certain financial products (other than securities) or arrange the issue of a financial product, you will receive a PDS. The PDS outlines the key features, significant benefits, risks and fees associated with the financial product.

Fee Consent Documents

If we enter into an ongoing fee arrangement (“**OFA**”) with you, we will provide you with a Consent to Enter or a Consent to Renew the OFA (as relevant) along with a Consent to Deduct. Each consent document will contain important information about why the consent is being sought.

How can you provide us with instructions?

You can give us instructions in writing, by phone, email or any other means that we agree with you from time to time.

Who do we act for?

We provide financial services on behalf of the Licensee. In providing those financial services, the Licensee acts on its own behalf.

Adviser Profile

About Janahan (Jana) Kumaralingam

As a financial planner, Jana advises wealth accumulators (including young professionals and business owners) as well as clients who are considering retirement. He also brings a host of experience and technical knowledge from his previous roles as an adviser in a boutique financial planning firm and a fund administrator within a retail superannuation fund.

Jana looks beyond the standard client service to provide real value to clients. Clients describe Jana as knowledgeable, passionate and willing to go the extra mile to help.

Qualifications and memberships

Jana has a Bachelor of Business & Commerce (Accounting), an Advanced Diploma in Financial Services Financial Planning) and is a member of the SMSF Association as a credited SMSF Specialist and a Financial Advice Association Australia and has a Certified Financial Planner accreditation. Jana is FASEA qualified. Jana has completed the Financial Adviser Examination, and is a Qualified Tax Relevant Provider (QTRP).

Fees and charges

We will charge you a fee for personal advice and dealing services we provide to you.

All fees are **inclusive** of GST.

One-off fees

We may charge a one-off fee for providing and implementing a discrete piece of advice, or processing a transaction for you. That fee will either be:

- a fixed fee; or
- an hourly rate; or

- calculated as a percentage of funds under management/advice.

Our fixed fee for personal advice is generally in the range of \$3,300 to \$11,000, depending on the amount of work required. We will provide an explanation of how we calculate the fee before we provide advice to you.

Our fixed fee for processing a transaction (i.e. no advice) for you is a minimum of \$275, or 1.65% of the transaction value, whichever is higher.

Our hourly rate is \$330 (and the total fee payable for our work will be based on the number of hours work done). We will provide an estimate of the number of hours and the total fee payable before we provide advice to you.

If our advice is solely in relation to life insurance products we may charge a one-off fee of \$660. We are remunerated for our life insurance advice by commissions paid by life insurers.

Ongoing fees

If you enter into an ongoing service arrangement with us, we will charge you a yearly fee based on the services you are entitled to receive.

Our annual fee will vary from a minimum of \$2,560 per annum; paid in monthly instalments from your superannuation or investment cash account, calculated with reference to the complexity of services and/ or balance of the superannuation or investment account.

Fee disclosure

Details of these fees and benefits will be provided to you in an engagement letter or services agreement before we provide advice, and will be included in the SOA or ROA provided to you.

Please contact us if you require any further information about how we charge and receive fees.

Remuneration, commissions and other benefits

We may receive commissions from life insurance companies.

Initial commission

We may receive commission of:

- up to 66% of the first year's premium for new policies implemented from 1 January 2020
- up to 77% of the first year's premium for policies implemented between 1 January 2019 and 31 December 2019
- up to 88% of the first year's premium for policies implemented between 1 January 2018 and 31 December 2018

Where you change the level of cover on a policy and your premium increases as a result, we may receive commission on the increase in the premium (e.g. if your premium was \$1,000 and it is now \$1,200, we would receive "initial" commission on the additional \$200). This commission is capped at the percentage applicable in the year that you implemented the policy – e.g. if you commenced

a policy in June 2018 and increase the cover now, we may receive up to 88% of the increase in premium.

We may also receive "initial" commission on the increase to the premium of existing policies that were implemented prior to 1 January 2018 (where that increase is a result of action by you).

Ongoing commission

We receive ongoing commission calculated as a percentage of the premium paid to the insurer.

Ongoing commission on policies entered into after 1 January 2018 is capped at a maximum of 22% of the commission.

How we are paid

All fees are payable to the Licensee. The Licensee retains 0% and pays Vostro Private Wealth Pty Ltd (**VPW**) 100%. Janahan Kumaralingam as a Partner of VPW, is entitled to a director's drawing if and when paid.

Associations (or Joint Ventures)

We are required to disclose any associations or relationships between us, our related entities and product issuers that could reasonably be capable of influencing the financial services we provide to you. We are associated with entities who may refer clients to us from time to time. They might receive an indirect benefit including a share of revenue. We will tell you in the Statement of Advice who will receive that fee or commission, and the amount they will receive. The joint ventures include:

- ABA Partners
- ABR Partners
- Acorn Consulting Group
- BABO Group
- Comune Insurance Partners
- McHenry Partners
- Praemium Separately Managed Account (SMA) - Vostro Conservative, Balanced and Growth Investment Option
- SEIVA Wealth Management
- Shakespeare Rae
- Stride Partners

Complaints

We are fully committed to providing quality financial services.

If you have a complaint about the services we provide to you, please follow the steps outlined below. The Licensee's dispute resolution system is free of charge. The Licensee is a member of the Australian Financial Complaints Authority (AFCA) complaints resolution scheme.

Step 1

Contact the Complaint Officer and provide the details of your complaint. The relevant contact details are:

- The Complaint Officer
- Email: admin@bespokewealthpartners.com.au
- Telephone: 0414 357 589

The Licensee will endeavour to acknowledge receipt of your complaint within one business day (or as soon as practicable).

The Licensee will endeavour to resolve your complaint quickly and fairly, within 30 days of receipt of your initial complaint. In some circumstances, for example where the complaint involves particularly complex issues, it may take longer than 30 days to resolve a complaint. If the Licensee determines that it will take longer than 30 days to resolve a complaint, the Licensee will write to you to explain the delay.

The Licensee will provide a written response informing you of the final outcome of your complaint and your rights to escalate the complaint if you are not satisfied with the Licensee's final decision.

Step 2

If you are not satisfied with the Licensee's final response to your complaint, or the Licensee has not resolved your complaint within 30 days, you may lodge your complaint with AFCA (provided that the complaint is within AFCA's terms of reference). AFCA is an independent complaints resolution body which is available to you free of charge.

Please note that AFCA will not initiate its process until the Licensee has had prior opportunity to respond to your complaint.

Online	www.afca.org.au
Email	info@afca.org.au
Phone	1800 931 678
Fax	(03) 9613 6399
Mail	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

Compensation arrangements

The Licensee holds professional indemnity insurance in respect of our financial services which complies with the *Corporations Act 2001* (Cth). The professional indemnity insurance covers all of

the financial services you are provided, even if they were provided by a person who is no longer an Authorised Representative.

Privacy

Australian Privacy Principles apply to how we collect and use personal information. The information you provide to us for the purposes of obtaining financial product advice must only be used to:

- fully understand your financial planning needs;
- provide you with information, products or services that you might reasonably expect or request;
- manage rights under any laws applying to the services provided; and
- conduct research and marketing which includes direct marketing (although you have the right to specifically instruct us not to use your personal information for these purposes).

For details of how we collect and use your personal information, please refer to our privacy policy which is available on our website.

Further Information

If you have any further queries about our financial services, please contact us.

Contact us

Name	Janahan Kumaralingam (Authorised Representative)
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Phone	(03) 9867 4345
Email	janahan@vostroprivate.com.au