

# FREEDOM FINANCE

A U S T R A L I A

"HELPING YOU LIVE YOUR BEST LIFE"

## Wealth Trail

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### Financial Services Guide

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Version 3.

Date: 1 July 2021

# 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, our associates and related parties 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; and 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 to assist you in deciding whether to use any of the services offered— 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 (other than direct holding of securities), you generally will be given a Product Disclosure Statement (PDS) which outlines the product features, risks 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).

You should read the PDS carefully before making any decision to buy a financial product or accept the strategy recommended to you.

A Fee Disclosure Statement (FDS) will be issued to you in instances where you enter into an Ongoing Fee Arrangement with your adviser.

## Lack of Independence

Freedom Finance Australia is not independent, impartial, or unbiased because we:

- a) receive commissions for the advice we provide on life risk insurance products; and
- b) are a related entity of Boutique Wealth Australia which issues a range of financial products that we may recommend to our clients.

## 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 email or letter) or another method agreed with us.

# About us

## Who we are

We are authorised representatives of

Wealth Trail Pty Ltd ABN 73 634 620 956

Australian Financial Services Licence Number 521 516 ("Wealth Trail") .

Address: Level 14, 636 St Kilda Rd, Melbourne, VIC 3004

Phone: 1800 662 891

Email: [operations@wealthtrail.com.au](mailto:operations@wealthtrail.com.au)

Wealth Trail is a Boutique AFSL established to provide financial advice and related services to clients of Freedom Finance Australia and associated entities. Wealth Trail & Freedom Finance Australia are responsible for providing financial advice and services to over 20 000 Australian's, managing in excess of \$1.5 billion of investments.

Freedom Finance Australia's mission is "Helping you live your best life". Whether you have a little or a lot, there are strategies and action we can take to enhance your financial future. And we recognise it isn't all about the money. Money is an enabler to helping you live your best life. We get satisfaction from helping people and seeing the fruits of your labour allow you to make decisions in life to travel, live new experiences, contribute to your community, give family members a leg up and spend quality time with family and friends. We will help you make decisions and keep you accountable to action.

We understand everyone is busy and we offer our services in a tailored and flexible manner face-to-face, via video call or over the phone.

## The Financial Services we offer are provided by

Freedom Finance Australia Wealth Pty Ltd

ABN 73 644 564 090 | Authorised Representative No. 1283609

Trading as: Freedom Finance Australia

### Contact Details

Address: Level 14, 636 St Kilda Rd, Melbourne, Vic 3004

Phone: 1800 662 891

Email: [info@ffau.com.au](mailto:info@ffau.com.au)

Wealth Trail Pty Ltd has authorised us to provide you with this Financial Services Guide

The following financial adviser is authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of Freedom Finance Australia Wealth Pty Ltd and Wealth Trail Pty Ltd.

## **Adviser Name: Michael Oren**

ASIC Authorised Representative No. 1001782

### Contact Details

Address: Level 14, 636 St Kilda Rd, Melbourne, Vic 3004  
Phone: 1800 662 891  
Mobile: 0477 240 690  
Email: michael.o@ffau.com.au

Michael can advise on the following product areas:

Provide Financial Product Advice:

- Deposits and payment products – non-basic deposit products
- Government debentures, stocks or bonds
- Life products
- Investment life products
- Life risk insurance products
- Managed investment schemes, including IDPS
- Retirement savings account products
- Superannuation including SMSF
- Securities

Further information may be found on the Australian Securities and Investments Commission (ASIC) Financial Advisers Register: [www.moneySMART.gov.au/financial-advisers-register](http://www.moneySMART.gov.au/financial-advisers-register)

# Freedom Finance Australia Wealth Pty Ltd

## What we do

We are authorised by Wealth Trail to provide financial advice in relation to:

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

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

Freedom Finance Australia Wealth Pty Ltd is not authorised by Wealth Trail Pty Ltd to provide financial product advice in the following financial products:

- General Insurance Products

We are not authorised to provide any other financial services or financial products on behalf of Wealth Trail.

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.

## 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:
  - by direct invoice from us;
  - as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
  - via commission we may receive from a financial product provider when you commence an investment and ongoing commission during the life of the investment;
  - via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the 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. Please refer to the “How we charge for our services” section of this FSG for further information.

## 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. Wealth Trail Pty Ltd, 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 Wealth Trail Pty Ltd may charge you for the cost of providing this information to you.

## Sponsorship

Wealth Trail Pty Ltd may receive cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and Freedom Finance Australia & your financial adviser 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

## How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. 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.

The exact amounts of fees and charges and initial and ongoing commissions for the products you have purchased as a result of my recommendation to you will be detailed in your Statement of Advice.

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<b>Initial consultation</b>	No initial consultation fee will be charged.
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<b>Advice preparation and implementation fees</b>	<p>If you elect to pay us a fee for advice the following fees will apply.</p> <p>Advice preparation and implementation fees will depend on the size of the investment portfolio and the complexity of the advice. Fees for the preparation and implementation of your advice may range from a minimum of \$3000 up to \$100,000.</p> <p>Alternatively, our implementation fee can be calculated as a percentage of your total portfolio ranging between 0% and 5.5%. For example, if value of your investment is \$100,000, and we charge you 2.2% you will pay \$2,200.</p> <p>Complex advice that contains 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.</p>
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<b>Ongoing fee for advice</b>	<p>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.</p> <p>If you are on an ongoing fee arrangement or annual service agreement, the fees for our services may be:</p> <ul style="list-style-type: none"><li>a set fee between \$0pa and \$100,000pa which may be deducted from your investment account or invoiced to you directly; or</li><li>a fee that is calculated as a percentage of your total portfolio between 0.5% pa and 2.2%pa which may be deducted from your investment account or invoiced to you directly. For example, if value of your investment is \$100,000, and we charge you 1.1% you will pay \$1,100.</li></ul>
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**Ad hoc advice**

Where you do not wish to participate in an ongoing service agreement or a 12 month Fixed Term Agreement but require ongoing advice on an ad hoc basis, an hourly fee of \$396 will be charged for your adviser or \$165 for one of our administration team.

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**Insurance products**

Where we arrange a life insurance product for you, the relevant insurer may 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).

An annual commission may 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. Commissions are inclusive of GST.

<b>Product Type</b>	<b>Initial Commission</b>	<b>Ongoing Commission</b>
Insurance (including those held within superannuation)	Up to 66% of the first year's premium for new policies implemented  We may receive commissions on increases or additions to existing policies of up to 130%.	Up to 22% of the insurance premium for new policies each following year.  We may receive ongoing commissions on existing policies of up to 33%.

For example, on an insurance premium of \$1,000 that pays 66% initial commission and 22% ongoing commission your adviser will receive an upfront commission of \$660 and ongoing of \$220.

Commission is paid to us by the product provider and is not an additional cost to you.

**Pre-existing arrangements**

For clients already in a pre-1 July 2013 commission arrangement, we may receive commission on investment and superannuation products or margin lending products. For investment products and superannuation 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.



## Related Services

Wealth Trail is part of the Freedom Finance Australia Group of companies (“FFAU Group”). The Directors and shareholders of Wealth Trail, hold shares (direct and indirect/wholly and partially) in the below listed entities within the FFAU Group. These entities have relationships and arrangements with Wealth Trail.

- Boutique Wealth Australia Pty Ltd which operate under its own Australian Financial Service license (No. 494253) and is an issuer of investment products
- Freedom Finance MB Pty Ltd and Freedom Finance (MB) NSW Pty Ltd which provide mortgage broking services.
- Freedom Finance Accounting Pty Ltd and FFAU Consulting Pty Ltd which provides accounting, taxation and SMSF administration services.
- Planned Property Pty Ltd which is a property investment business.
- Freedom Finance General Insurance Pty Ltd which provides general insurance broking services.
- The Cleva Co Pty Ltd which provides digital financial advice tools.

If it is appropriate to your circumstances the advisers of Freedom Finance Australia Wealth Pty Ltd may recommend you use the investment, accountancy, taxation, finance, general insurance or property referral related services of persons who are also owned by one of Wealth Trail’s Directors and Shareholders.

The Directors and shareholders of Wealth Trail do not receive any direct remuneration or benefit as a result of these referrals. Where you are referred to a related entity by your adviser and take up the services of that business, the shareholders may share in distributions from that business. You are free to engage your own preferred professionals.

### Associations that may be capable of influencing the advice

Your adviser may recommend that you invest in a financial product issued by Boutique Wealth Australia Pty Ltd (“Boutique Wealth”). These include products and services with the following branding:

- Boutique Wealth Australia
- BWA

Boutique Wealth are Investment Advisers to the Responsible Entity of the investment products and earn an investment management fee of 0.60% plus GST based on a client’s investment balance in an investment product issued by them. For example, if you invested \$100,000 in one of Boutique Wealth’s financial products they will earn an investment management fee of \$660. This investment management fee is paid to the Responsible Entity from your investment balance and 100% is passed onto Boutique Wealth.

Investments offered via Boutique Wealth are reviewed and benchmarked by the Wealth Trail Investment Committee against other comparable products in the market to ensure they are competitive in the market.

# 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 within three business days, please contact our Advice Dispute Resolution Team on:

Phone: 1800 662 891

Email: [complaints@wealthtrail.com.au](mailto:complaints@wealthtrail.com.au)

In writing to:

Advice Dispute Resolution Team  
Wealth Trail  
Level 14, 636 St Kilda Rd  
Melbourne VIC 3004

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

Website: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto: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.

## Professional Indemnity insurance

Wealth Trail 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 Wealth Trail at the time of providing the advice, but are no longer authorised representatives of Wealth Trail at the time of your complaint.

# 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.

## Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as personal circumstances, financial, religious affiliation, ethnicity and 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 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 Wealth Trail and other members of the FFAU 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, technology, computer or other business services, including our Licensee Wealth Trail and other members of the FFAU 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.

## Consent to marketing activity

We presume you consent to being contacted by us (including Wealth Trail and other members of the FFAU 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 contact the Privacy Officer on the information below:

Attention: Privacy Officer  
Address: Level 14, 636 St Kilda Rd, Melbourne, VIC 3004  
Phone: 1800 662 891  
Email: [complaints@wealthtrail.com.au](mailto:complaints@wealthtrail.com.au)

You can find out how we will deal these complaints, by referring to the 'Your confidence in our advice' section of this FSG.

If you are not satisfied with our response you can contact the Office of the Australian Information Commissioner (OAIC).

The contact details for OAIC are:

Mail GPO box 5218 Sydney NSW 2001  
Phone 1300 363 992  
Email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Online [www.oaic.gov.au](http://www.oaic.gov.au)

You may also complain to the Australian Financial Complaints Authority (AFCA)

The contact details for AFCA are:

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

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)