



# FINANCIAL SERVICES GUIDE PART 1

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This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Magnitude Group Pty Ltd ('Magnitude' or 'Licensee'), and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Magnitude;
- Magnitude as the holder of an AFSL;
- the financial services that Magnitude offer;
- the process we follow to provide financial services;
- how we, our associates, and Magnitude are paid;
- any arrangements which may influence our advice to you;
- how we and Magnitude protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Magnitude. References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Magnitude or your Authorised Representatives of Magnitude, as the context requires.

# PART 1

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

## ABOUT MAGNITUDE

Magnitude is a Professional Partner of the Financial Planning Association of Australia (FPA).

Magnitude is a wholly owned subsidiary of the Westpac Group. The Westpac Group includes a number of companies that provide financial products and services, funds management, insurance, superannuation, investment and administrative services. The Westpac Group includes Advance Asset Management Ltd, Asgard Capital Management Ltd ('Asgard'), Ascalon Capital Managers Ltd, St.George Life Ltd, BT Funds Management Ltd, BT Funds Management No.2 Ltd, BT Portfolio Services Ltd, BT Securities Ltd, BT (Queensland) Pty Ltd, BT Life Ltd, Westpac Banking Corporation ('Westpac'), Westpac Life Insurance Services Ltd, Westpac Securities Administration Ltd, Westpac General Insurance Ltd, Westpac Securities Ltd, Westpac Financial Services Ltd, Westpac Funds Management Ltd, Hastings Funds Management Ltd and other entities bearing the 'Westpac', 'St.George', 'BT' and 'Asgard' names.

While we have access to a broad range of products and platforms, we are likely at times to recommend products from members of the Westpac Group. However, we will need to be satisfied that if we make a recommendation involving one of these products, that it is in your best interests for us to do so.

# SECTION 1: FINANCIAL SERVICES GUIDE

## WHAT OTHER INFORMATION SHOULD YOU CONSIDER BEFORE DECIDING WHETHER TO PROCEED WITH OUR RECOMMENDATIONS?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

## WHO PROVIDES THE FINANCIAL SERVICES DESCRIBED IN THIS FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Magnitude.

Part 2 of this Guide contains further details about your financial adviser, and our experience, qualifications and professional memberships.

## WHO IS RESPONSIBLE FOR THOSE FINANCIAL SERVICES?

As the holder of an AFSL, Magnitude is responsible for the financial services we provide to you. Magnitude acts on its own behalf when these financial services are provided to you.

In relation to the financial services offered in this FSG, Magnitude, as the holder of an AFSL, does not act on behalf of any other person or licensee. Magnitude is only responsible for the services offered in the FSG.

The law requires Magnitude to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Magnitude and/or its Authorised Representatives. Magnitude has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

## WHAT FINANCIAL SERVICES DO WE OFFER?

Magnitude is able to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide) including:

- deposit products;
- government debentures, stocks or bonds;
- life investment and life risk products;
- managed investment schemes including investor directed portfolio services;
- standard margin lending facilities;
- derivatives;
- retirement savings account products;
- securities (e.g. shares); and
- superannuation products.

Some of the services you are able to access through Magnitude include:

- financial planning advice;
- wealth accumulation advice;
- superannuation advice, including self managed superannuation funds;
- redundancy advice;
- retirement advice;
- gearing strategies;
- cash flow advice;
- social security benefits advice;
- life and disability insurance advice;
- managed discretionary account services; and
- estate planning services (financial planning).

## WHAT PRODUCTS ARE AVAILABLE?

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available products we can recommend are contained in the Approved Product List (APL).

Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from. We conduct due diligence on external research report providers that provide us with research.

We will only recommend a product to you after considering its appropriateness to your individual objectives, financial situation and needs. The recommendations will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product which is not on the APL.

## HOW DO WE ENSURE THAT THE ADVICE WE GIVE YOU SUITS YOUR NEEDS AND OBJECTIVES?

To ensure we provide advice suitable for your needs and financial circumstances, we firstly need to understand your financial situation, personal financial objectives and needs. We will follow a step-by-step process as outlined below:

- 1.) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
- 2.) We will collect all the information we need from you, including your personal financial situation, financial objectives and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing your full personal information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.
- 3.) We will help you identify your goals and may discuss your attitude towards investment risk.
- 4.) We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where required we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, a RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice. Where we recommend financial products, we will provide you with a Product Disclosure Statement (PDS) or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to purchase that product.
- 5.) We will discuss our recommendations with you, make any changes you require and gain your agreement to implement those recommendations.
- 6.) We will then implement those recommendations.
- 7.) We will meet with you periodically to review your financial circumstances if we agree to an ongoing advice service arrangement which includes a regular review component. If an ongoing advice service arrangement is entered into, this will be documented in your Ongoing Advice Service Arrangement Letter and/or SoA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via a SoA or RoA, as outlined above. These circumstances may include:

- 1.) Where we provide you with only general advice, such as through seminars and newsletters;
- 2.) When we are acting under a Managed Discretionary Account (MDA) service which allows us to manage investments on your behalf, once you have accepted this service in a SoA;

- 3.) Further advice or verbal advice – if you previously received advice recorded in a SoA, any further personal advice provided by us may be recorded in a RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below).

## WHAT DOCUMENTS DO YOU GET IF WE PROVIDE FURTHER ADVICE?

Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with a SoA for this further advice. Where this is the case, if you have not already been provided with a RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this Guide) for a period of seven years from when the further advice was first provided to you.

## HOW CAN YOU INSTRUCT US?

You may specify how you would like to give us instructions, for example, by phone, fax or email, using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

## OTHER SERVICES

Related businesses may provide services other than financial planning services. For example, via a related business, we may also act as your accountant or legal adviser, or advise you on real estate investments or your finance needs (performing credit activities for you). While we may provide these other services, you should understand that these other services are not provided under Magnitude's AFSL and Magnitude does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

Examples of the services which Magnitude is not responsible for include:

- general insurance services (e.g. car insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- consulting services; and
- credit activities.

## HOW ARE WE PAID FOR OUR SERVICES?

We and Magnitude may receive:

- fees paid by clients;
- commissions paid by product providers;
- other payments by product providers; and
- other benefits.

All fees and commissions are payable to Magnitude. We may receive up to 100% of any fees and commissions received.

Details of any fees, commissions or other benefits that we, Magnitude or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

## WHAT TYPE OF FEES, COMMISSIONS, PAYMENTS AND OTHER BENEFITS DO WE RECEIVE FOR OUR SERVICES?

The types of fees, commissions and other benefits that may be received by us and by Magnitude include the following:

### Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

### Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

### Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

### Referral fees

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the products involved. We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

### Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where it is debited from your investments, it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

### Commissions

If you take out a financial product through us, Magnitude may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees, premiums and interest rate (in the case of margin loans) you pay for the product. This is not an additional cost to you. We may agree to rebate some or all of these.

The commission payable for different classes of financial products include the following:

### Investment Products

For investment products, including superannuation and annuities, commissions are generally deducted from the funds you invest. Commissions on investment products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you acquire an investment product before 1 July 2014, commissions may be payable where Magnitude had an existing arrangement with the product issuer prior to 1 July 2013.

Magnitude may receive between 0% and 1% of your initial investment as initial commissions from product providers whose products are recommended to you. Magnitude may also receive ongoing commissions from the management fees of the product providers.

Ongoing commissions range between 0% and 1% p.a. of your investment balance. Magnitude may pass up to 100% of these commissions to us.

#### Example

We recommend you invest \$10,000 in an investment product. The applicable initial commission is 1% and ongoing commissions are 1% p.a. Magnitude may receive initial commission of \$100 and may pass up to \$100 of that to us. Assuming the investment amount stays the same, each year Magnitude may receive ongoing commission of \$100 and may pass up to \$100 to us.

### Life Insurance Products

Depending on the product you purchase, Magnitude may receive between 0% and 140% of the annual premium as initial commission, and between 0% and 38.5% p.a. of the annual premium for ongoing (trail) commission. Magnitude may pass up to 100% of these commissions to us. In addition, Westpac Group may receive benefits as part of the Magnitude Risk Partner Program in the form of education, training and other support and resources to assist in the delivery of life insurance advice. Participants in the Risk Partner Program may pay a fee to Magnitude. Participants may be given the opportunity to promote the benefits of their life insurance products. The total amount of fees, or the fees that may be paid by each individual life insurance product provider, will depend upon the commercial arrangements that may be negotiated from time to time between Magnitude and each product provider. These payments will not change the amount of the premium payable by you.

#### Example

We recommend an insurance product to you. The annual premium is \$450 p.a. Magnitude may receive up to \$630 as an initial payment and may pass \$630 to us. Assuming the premium stays the same, each year, Magnitude may receive up to \$173 p.a. as an ongoing (trail) commission and may pass up to \$173 to us.

## Margin Lending Products

If we organise, or increase a margin loan for you, Magnitude may receive payments in the form of ongoing commissions from the margin loan provider. Commissions on margin lending products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have entered into a margin lending product arrangement prior to 1 July 2014, commissions may be payable where Magnitude has an existing arrangement with the margin loan provider prior to 1 July 2013. These commissions range between 0% and 0.5% p.a. of your loan balance. Magnitude may pass up to 100% of these commissions to us.

### Example

We recommend you borrow \$10,000 through a margin loan. The applicable ongoing commission is 0.5% p.a. Assuming the loan balance stays the same, each year Magnitude will receive ongoing commission of \$50 and may pass up to \$50 to us.

## OTHER PAYMENTS FROM PRODUCT PROVIDERS

### Wrap and other Portfolio Administration Services

The commission payments disclosed in this section may only be payable in certain circumstances where an arrangement existed between Magnitude (or a related party of Magnitude) and the relevant product providers prior to 1 July 2013, where you invested through Wrap or another portfolio administration service described below before 1 July 2014.

- 1.) Where we recommend you invest through Select Wrap, Select SuperWrap, Select Wrap Essentials, Select SuperWrap Essentials, BT Elect Portfolio, Macquarie Private Portfolio Management (Individually Managed Account or the Macquarie Separately Managed Account) and Asgard eWRAP Investment, Asgard eWRAP Super/Pension and Asgard Master Trust ('Qualifying Products') or another approved portfolio administration service and you accept that recommendation, Magnitude may receive certain commission payments and may pass on a proportion of these commissions to us. These commissions are included in the fees you pay for the products or service. This is not an additional cost to you. Further detail is provided below:
  - a.) When you invest via Select Wrap or Select SuperWrap, BT Portfolio Services Ltd (the 'administrator' for Select Wrap and Select SuperWrap) pays a licensee commission to Magnitude of up to 65% p.a. of the account keeping fees you pay to the administrator in relation to your investment. Magnitude may pass on up to 67.5% of the licensee commission it receives from the administrator to us. This rate will vary depending on the total value of the licensee commissions we generate for Magnitude, and the amount of new business written by us in the Qualifying Products.

### Example

We recommend you invest \$100,000 in Select Wrap and you accept the advice. This investment will incur an account keeping fee of \$650 p.a. of which the administrator pays up to \$423 p.a. to Magnitude. Of this amount, Magnitude may pass up to \$285 to us.

- b.) When you invest via Select Wrap Essentials or Select SuperWrap Essentials, BT Portfolio Services Ltd (the 'administrator' for Select Wrap Essentials and Select SuperWrap Essentials) pays a licensee commission to Magnitude of 0.275% p.a. on the sum invested in Select Wrap Essentials and Select SuperWrap Essentials. Magnitude may pass up to 67.5% of the licensee commission it receives from the administrator to us. This rate will vary depending on the total value of the licensee commissions we generate for Magnitude, and the amount of new business written by us in the Qualifying Products.

### Example

We recommend you invest \$100,000 in Select Wrap Essentials and you accept the advice. The administrator currently pays \$275 p.a. to Magnitude and of that Magnitude may pass up to \$186 to us.

- c.) Where you invested in BT Elect Portfolio prior to 1 October 2010 and you continue to hold this product, Westpac RE Limited (the responsible entity of BT Elect Portfolio) pays a licensee commission to Magnitude of up to 0.25% p.a. on the sum invested, payable out of the Management fee that you pay to the administrator in relation to your investments as detailed in the relevant PDS. Magnitude may pass on up to 67.5% of the licensee commission it receives from the administrator to us. This rate will vary depending on the total value of the licensee commissions we generate for Magnitude and the amount of new business written by us in the Qualifying Product.

### Example

We recommend you continue to hold \$100,000 in your BT Elect Portfolio account and you accept the advice. The responsible entity currently pays \$250 p.a. to Magnitude and of that Magnitude may pass up to \$169 to us.

- d.) When you invest via Macquarie Private Portfolio Management (Individually Managed Account or the Macquarie Separately Managed Account), Macquarie Portfolio Management Ltd pays a dealer margin to Magnitude of up to 0.25% p.a. on the sum invested. The dealer margin is payable out of the Management Fee that you pay to Macquarie Portfolio Management Ltd in relation to your investment as detailed in the relevant PDS. Magnitude may pass on up to 67.5% of the licensee commission it receives

from Macquarie Private Portfolio Management to us. This rate will vary depending on the total value of the licensee commissions we generate for Magnitude and the amount of new business written by us in the Qualifying Products.

#### Example

We recommend you invest \$100,000 in a Macquarie Private Portfolio Management (Individually Managed Account) and you accept that advice. You pay a Management Fee of up to \$2,000 p.a. to Macquarie Portfolio Management Ltd. From the Management Fee, Macquarie Portfolio Management Ltd pays Magnitude an amount of up to \$250 p.a. in dealer margin. Magnitude may pass up to \$169 to us.

- e.) When you invest via Asgard eWRAP Investment, Asgard eWRAP Super/Pension and certain eligible Asgard master trust products, Asgard (the 'custodian and administrator' for these Asgard products) pays a licensee commission to Magnitude of up to 50% p.a. of the administration fees you pay in relation to your investment. Magnitude may pass on up to 67.5% of the licensee commission it receives from the administrator to us. This rate will vary depending on the total value of the licensee commissions we generate for Magnitude and the amount of new business written by us in the Qualifying Products.

#### Example

We recommend you invest \$100,000 in managed investments through Asgard eWRAP Investment and you accept the advice. This investment will incur an administration fee of \$820 p.a. of which the administrator pays up to \$410 p.a. to Magnitude. Of this amount, Magnitude may pass up to \$277 to us.

- 2.) When you invest via certain portfolio administration services administered by BT Portfolio Services Ltd ('Wrap Products') into certain investment funds (known as the 'Advantage Investment Series'), a payment may be paid by the relevant fund manager to BT Portfolio Services Ltd on the sum invested ('Fund Manager Payment'). The Fund Manager Payment only applies where you made an initial investment into the relevant fund through a Wrap Product before 1 July 2014. You will be told which funds qualify for the Fund Manager Payment. The total Fund Manager Payment is up to 41% of the Management Expense Ratio (MER) applicable to the relevant funds, multiplied by the amount you have invested in those funds. The Fund Manager Payment is calculated monthly on the average opening and closing balances of the Advantage Investment Series funds held by you.

Where applicable, a portion of the Fund Manager Payment is rebated to you and a portion is retained as commission by Magnitude and by the platform provider of the Wrap Products.

Where applicable, Magnitude will receive a monthly commission of up to 0.014% of the average balance you

have invested in the Advantage Investment Series for the month. BT Portfolio Services Ltd will receive a monthly commission of the balance of the total Fund Manager Payment. We do not receive any part of this payment.

#### Example

Where the average balance you have invested in the Advantage Investment Series via a Wrap Product is \$100,000, you will receive a monthly rebate of up to \$8.30 and Magnitude will receive a monthly commission of up to \$14.00. We are under no obligation to recommend Advantage Investment Series funds through the Wrap Products and neither Magnitude nor we receive any portion of the Fund Manager Payment.

- 3.) When you invest via Select Wrap or Select SuperWrap, BT Portfolio Services Ltd (the 'administrator' for Select Wrap and Select SuperWrap) pays an additional commission to Magnitude of an amount equal to 0.25% p.a. of the balance of your wrap platform cash account. This amount is paid by the administrator out of the cash account fee you pay to the platform provider (which is calculated daily and charged before interest is credited to your account quarterly). We do not receive any part of this payment.

#### Example

If your wrap platform cash account was \$50,000 for the whole year, the additional commission Magnitude would receive is \$125 p.a.

- 4.) When you invest via the Magnitude Customised Portfolio Service, Magnitude will receive a Dealer Group Service Fee of 0.30% p.a. of the balance of your account in the Magnitude Customised Portfolio Service. We do not receive any part of this payment. An Adviser Service Fee of between 0% and 1.50% p.a. of the balance in your Magnitude Customised Portfolio Service may also be paid to Magnitude. We may receive up to 100% of that amount.

#### Example

If your balance was \$50,000 for the whole year, an Adviser Service Fee of between \$0 and \$750 p.a. would apply (of which we would receive up to \$750 p.a.) and a Dealer Group Service Fee of \$150 p.a. would apply and be paid to Magnitude.

- 5.) When you invest via BT Wrap or BT SuperWrap, BT Portfolio Services Ltd (the 'administrator' for BT Wrap and BT SuperWrap), pays a licensee commission to Magnitude of 44% p.a. of the account keeping fees you pay to the administrator in relation to your investment. We do not receive any part of this payment.

#### Example

We recommend you invest \$100,000 in BT Wrap and you accept the advice. This investment will incur an account keeping fee of \$790 p.a. of which the administrator pays up to \$348 p.a. to Magnitude.



## Life Insurance Providers

Magnitude may enter into arrangements with life insurance providers relating to the sale of certain life insurance products that provide for payment(s) to Magnitude in the form of a licensee commission based on the volume of sales. No amounts received by Magnitude relating to these arrangements are passed through to us. Currently, Magnitude may receive remuneration of up to 17% p.a. of the premiums written annually with applicable life insurance providers.

### Example

If you purchase a relevant life insurance product and the annual premium is \$450, Magnitude may receive up to \$76.50 p.a. from that life insurance provider.

## OTHER BENEFITS

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer, or that relate to educational and training purposes.

A copy of the register is available on request for a small charge.

## WILL ANY OTHER PARTIES BENEFIT FROM THE FINANCIAL SERVICES OFFERED IN THIS FSG?

Westpac may benefit from remuneration paid in respect of the financial services offered in this FSG.

Product providers in the Westpac Group receive product fees and may be entitled to certain expense reimbursements if you invest in their products. Product fees are generally calculated as a percentage of the amount or value of your investment in these products.

Sometimes Westpac Group companies do not charge specific fees for their products or services. This may be the case where, for instance, Westpac buys, sells or issues derivatives, foreign exchange products and certain other financial products from or to a customer. In these circumstances, instead of a fee, Westpac incorporates margins (being the difference between what you pay for a financial product and what it costs Westpac to issue it to you) into the buy, sell or issue price or rate.

Westpac Group companies may also benefit from other roles they perform in a transaction. When these products or services are provided to you, details of these fees or benefits and how they are calculated will be disclosed in the relevant PDS or other disclosure document that will be provided to you by us.

### Preferred partners – Asgard platform

Westpac or a related company (excluding Asgard Capital Management Ltd) receives benefits in the form of fees from fund managers that it selected as preferred partners, where those arrangements were put in place prior to 1 July 2013. To be selected as a preferred partner, these fund managers must have met certain quality hurdles (such as investment fund performance). Preferred partners may be given the

opportunity to promote the benefit of their managed funds to Westpac Group representatives and other advisers who use the Asgard platform, including Magnitude advisers.

Westpac or a related company (excluding Asgard Capital Management Ltd) receives up to 100% of the management fee received by preferred partners in respect of funds under administration in their products through the Asgard platform. This fee is negotiated individually with preferred partners and may vary from time to time.

The total amount of fees received will depend on all relevant circumstances, including funds that flow into, and which remain, under administration. We do not receive any part of this payment.

### Example

If you were to invest \$50,000 into a preferred partner's product via the Asgard platform and the management fee charged by the preferred partner is 1% p.a., the preferred partner may pay up to \$500 p.a. to Westpac or a related company (excluding Asgard).

If you choose to receive financial planning services, you acknowledge that we will be able to advise you on preferred partners' products. If you invest in a preferred partner's product as a consequence of such advice, fees, as outlined above, are payable.

We are under no obligation to recommend preferred partners' products. Please note that fund managers in general may pay rebates to Asgard and in such cases 100% is passed on to you directly by Asgard.

## WHAT ARRANGEMENTS MAY INFLUENCE OUR ADVICE TO YOU?

Magnitude's Approved Product List includes some Westpac and BT financial products as well as a range of financial products from product providers not associated with the Westpac Group. Magnitude does not require its Authorised Representatives to recommend only Westpac Group products.

We are generally only permitted to recommend Wrap services provided by platform providers within the Westpac Group, however we can recommend other Wrap services to you where it suits your objectives, financial situation and needs.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

## WHAT FEES DO WE PAY TO SOMEONE WHO REFERS YOU TO US?

If you are referred to us we may pay the referrer a fee. We may also provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.

The fee varies according to the referrer and financial products involved.

The fee may be a percentage of our fees, a percentage of the total amount invested paid through the referral, or a flat fee. We may pay these fees upfront when the financial service is provided, or the financial product is provided, or periodically as ongoing fees.

# SECTION 2

## PRIVACY STATEMENT

### WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

### COLLECTING AND DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to other members of the Westpac Group, anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Magnitude is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations, to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations. We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

### OTHER IMPORTANT INFORMATION

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available at [magnitude.com.au](http://magnitude.com.au) or by calling us; our contact details are set out in Part 2 of this Guide. It covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

### DEFINITIONS

'We', 'our', 'us' means Magnitude Group Pty Ltd and its Authorised Representatives.

'Westpac Group' means Westpac Banking Corporation and its related bodies corporate.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

# SECTION 3

## ARE YOU SATISFIED?

### WHAT TO DO IF YOU HAVE ANY CONCERNS ABOUT OUR SERVICES

Both we and Magnitude endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1.) Contact us first about your concern.
- 2.) If your concern is not resolved to your satisfaction, you may contact Magnitude by:


 National Manager  
Advice Complaints  
Magnitude Group Pty Ltd  
GPO Box 5265  
Sydney NSW 2001

 [wealthmanagementcomplaints@magnitude.com.au](mailto:wealthmanagementcomplaints@magnitude.com.au)

- 3.) If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Financial Ombudsman Service (FOS).


FOS independently and impartially resolves disputes between consumers, including some small businesses and participating financial services providers.

FOS provides an independent dispute resolution process covering complaints about financial services including banking, credit, loans, general insurance, life insurance, financial planning, investments, stockbroking, managed funds and pooled superannuation trusts. You may contact FOS by:

 GPO Box 3  
Melbourne VIC 3001

 [info@fos.org.au](mailto:info@fos.org.au)


 [fos.org.au](http://fos.org.au)

 1800 367 287


- 4.) The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring Australia's financial markets are fair and transparent, and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

 Australian Securities & Investments Commission  
GPO Box 9827  
Your Capital City  
Or  
PO Box 4000  
Gippsland Mail Centre  
Victoria 3841


 [asic.gov.au](http://asic.gov.au)

 1300 300 630

- 5.) The Financial Planning Association of Australia Limited (FPA), is the peak professional body for financial planning in Australia. The FPA provides the leadership and professional framework that enables members to deliver quality financial advice to their clients. All FPA members are bound by professional, technical and ethical standards as provided in the FPA Code of Professional Practice. The FPA has effective and appropriate policies and procedures in place to assist you with your complaint and ultimately help protect consumers and those planners doing the right thing. You may contact the FPA by:

 The Investigations Manager  
Financial Planning Association of Australia Ltd  
GPO Box 4285  
Sydney 2001

 [fpa.asn.au](http://fpa.asn.au)

 1300 626 393

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.

Magnitude <sup>®</sup>

# Financial Services Guide

## Part 2 (Adviser Profile)

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Date updated – 15 / 08 / 2017

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## PART 2 (Adviser Profile)

Part 2 (Adviser Profile) contains the following sections:

- About Your Adviser (Section 1);
- The Services I Provide (Section 2);
- Fees and Charges (Section 3); and
- Contact and Acknowledgment (Section 4).

This document is Part 2 (Adviser Profile) of the Financial Services Guide (FSG) dated 9 November 2015 and should be read together with Part 1. Part 2 sets out specific details about us as Authorised Representatives of Magnitude Group Pty Ltd ('Magnitude').

We are authorised by Magnitude to provide the financial services described in Part 1 and Part 2 (Adviser Profile) of the FSG. We have also been authorised by Magnitude to distribute this FSG.

### **Magnitude Group Pty Ltd.**

ABN 54 086 266 202 holder of  
Australian Financial Services Licence No. 221557

Tower 2, International Towers Sydney,  
200 Barangaroo Avenue, Barangaroo NSW 2000  
GPO Box 3371  
Sydney NSW 2001

Email: [contactus@magnitude.com.au](mailto:contactus@magnitude.com.au)  
Website: [magnitude.com.au](http://magnitude.com.au)

## SECTION 1

### ABOUT YOUR ADVISER

#### WHO IS YOUR FINANCIAL ADVISER?

Halpin Financial Services is a Corporate Authorised Representative of Magnitude Group Pty Ltd.

The financial advisers within Halpin Financial Services are Heath Visser, Michael Hart, Brendan Atkins, Craig Hill, Jane Gun, Michael Smith, Darren Bridges and Benjamin Sutherland.

In this document, the terms 'I', 'me', 'us', 'we' and 'our' refer to Heath Visser, Michael Hart, Brendan Atkins, Craig Hill, Jane Gun, Michael Smith, Darren Bridges and Benjamin Sutherland and Halpin Financial Services. The term 'Representatives' refers generally to Magnitude's Authorised Representatives.

Our Authorised Representative numbers are detailed below and the Corporate Authorised Representative number for Halpin Financial Services is 331222.

#### WHAT EXPERIENCE DOES YOUR FINANCIAL ADVISER HAVE?

##### **Heath Visser**

Heath Visser has been providing financial advice to clients since 1995. Heath's Authorised Representative Number issued by ASIC is 239856. Heath is a Partner of Halpin Financial Services.

Heath has achieved the following financial planning accreditations:

- Diploma of Financial Services (Financial Planning)
- Certified Financial Planner
- Tribeca – Self Managed Superannuation Funds
- ASX Accredited Listed Product Course

Heath is a member of the Financial Planning Association (FPA).

##### **Michael Hart**

Michael Hart has been providing financial advice to clients since 2001. Michael's Authorised Representative Number issued by ASIC is 331250.

Michael is a Partner of Halpin Financial Services.

Michael has achieved the following financial planning accreditations:

- Bachelor of Economics
- Graduate Diploma of Business (Banking)
- Master of Business Administration (MBA)
- Diploma of Financial Planning
- ASX Accredited Listed Product Course

Michael is a member of the Association of Financial Advisers (AFA)

##### **Brendan Atkins**

Brendan Atkins has been providing financial advice to clients since 1987. Brendan's Authorised Representative Number issued by ASIC is 239701.

Brendan is a Partner of Halpin Financial Services.

Brendan has achieved the following financial planning accreditations:

- Diploma of Financial Services (Financial Planning)
- Certified Financial Planner
- Kaplan – Self Managed Superannuation Funds
- ASX Accredited Listed Product Course

Brendan is active within a number of professional associations:

- Financial Planning Association (FPA)
- Member of SMSF Association

### **Jane Gun**

Jane Gun has been providing financial advice to clients since 2005. Jane's Authorised Representative Number issued by ASIC is 295262.

Jane is a Partner of Halpin Financial Services.

Jane has achieved the following financial planning accreditations:

- Bachelor of Business (Business Administration)
- Graduate Diploma in Financial Planning (FINSIA)
- ASX Derivatives level 1
- SMSF Specialist Advisor – SMSF Association
- Fellow of FINSIA
- ASX Accredited Listed Products Course

Jane is active member of the SMSF Association

### **Craig Hill**

Craig Hill has been providing financial advice to clients since 2009. Craig's Authorised Representative Number issued by ASIC is 334815.

Craig is a Partner of Halpin Financial Services.

Craig has achieved the following financial planning accreditations:

- Advanced Diploma of Financial Services (Financial Planning)
- Taxation Planning
- Estate Planning
- Kaplan – Self Managed Superannuation Funds
- ASX Accredited Listed Product Course

Craig is a member of the Association of Financial Advisers (AFA)

### **Michael Smith**

Michael Smith has been advising clients for 15 years, initially for large institutions and in his own business since 2007. Michael's Authorised Representative Number is 295750.

Michael is a Partner of Halpin Financial Services.

Michael has achieved the following financial planning accreditations:

- Advanced Diploma of Financial Services (Financial Planning)
- Stanford University – Strategic Leadership Program
- Licensed Risk Adviser
- Self-Managed Super Funds – Advanced Strategies

Michael is a member of the Financial Planning Association of Australia (FPA) and Association of Financial Advisers (AFA)

### **Darren Bridges**

Darren Bridges has been providing financial advice to clients since 2003. Darren's Authorised Representative Number issued by ASIC is 321120.

Darren has achieved the following financial planning accreditations:

- Master of Business Administration (MBA)
- Advanced Diploma of Financial Services (Financial Planning)
- Self-Managed Superannuation Funds
- Accredited Listed Products Adviser Program (ALPA)

Darren is a member of the Financial Planning Association of Australia (FPA)

### **Benjamin Sutherland**

Benjamin Sutherland has been working in financial services for 8 years and became an Adviser in 2011. Benjamin's Authorised Representative Number is 388182.

Benjamin has achieved the following financial planning accreditations:

- Diploma of Financial Services
- Advanced Diploma of Financial Planning

Benjamin is a member of the Association of Financial Advisers (AFA)

### **DOES YOUR FINANCIAL ADVISER HAVE ANY ASSOCIATIONS OR RELATIONSHIPS?**

Heath Visser, Michael Hart, Brendan Atkins, Craig Hill, Jane Gun and Michael Smith have an association with Halpin Financial Services (ABN 59 709 766 877) as a Partners. Fees and commissions are paid to Halpin Financial Services by Magnitude for distribution to them.

Halpin Financial Services is an Authorised Representative of Magnitude and is not a related company of Magnitude.

Halpin Financial Services also has a number of Joint Ventures in place and are listed below:

1. MSA Financial Services Pty Ltd - Corporate Authorised Representative number issued by the Australian Securities and Investments Commission (ASIC) is 296222.

MSA Financial Services Pty Ltd has been established as a Joint Venture between BSA Flinders Pty Ltd and Halpin Financial Services. The joint venture has been established to provide financial services and advice to clients

of BSA Flinders Pty Ltd. MSA Financial Services Pty Ltd has a service agreement with Halpin Financial Services to provide advice to the clients of this Joint Venture. All advice is provided by the Halpin Financial Services and their advice team.

- Gerhardy Whitelum Financial Services Pty Ltd - Corporate Authorised Representative number issued by the Australian Securities and Investments Commission (ASIC) is 443989.

Gerhardy Whitelum Financial Services Pty Ltd has been established as a Joint Venture between Gerhardy Whitelum Pty Ltd and Halpin Financial Services. The joint venture has been established to provide financial services and advice to clients of Gerhardy Whitelum Pty Ltd. Gerhardy Whitelum Financial Services Pty Ltd has a service agreement with Halpin Financial Services to provide advice to the clients of this Joint Venture. All advice is provided by the Halpin Financial Services and their advice team.

- Hillier Ellis Financial Services Pty Ltd – Corporate Authorised Representative number issued by the Australian Securities and Investments Commission (ASIC) is 327765.

Hillier Ellis Financial Services Pty Ltd has been established as a joint venture between Hillier Ellis Pty Ltd and Halpin Financial Services. The joint venture has been established to provide financial services and advice to clients of Hillier Ellis Pty Ltd. Hillier Ellis Financial Services Pty Ltd has a service agreement with Halpin Financial Services to provide advice to the clients of this Joint Venture. All advice is provided by the Halpin Financial Services and their advice team.

Heath Visser, Michael Hart, Brendan Atkins and Jane Gun have an association with Implemented Portfolios Pty Ltd ABN 36 141 881 147 as shareholders. Implemented Portfolio provides managed account services. As such, they may receive distributions of profit from Implemented Portfolios. Implemented Portfolio will not pay any fees or commission to Magnitude, Halpin or those listed above in respect of any products or services provided by Implemented Portfolios recommended by them but they will be remunerated in accordance with the Fee Structure set out in this FSG.

## SECTION 2

### THE SERVICES WE PROVIDE

#### WHAT AREAS IS YOUR FINANCIAL ADVISER AUTHORISED TO PROVIDE ADVICE ON?

Heath Visser, Michael Hart, Brendan Atkins, Michael Smith, Benjamin Sutherland, Craig Hill, Darren Bridges and Jane Gun are authorised to provide the following financial services:

- Deposit products
- Government debentures, stocks or Bonds
- Managed investments including investor directed portfolio services
- Retirement savings account products
- Superannuation products and Retirement Income streams
- Life investment and life risk insurance products
- Listed Securities including direct equities and listed income securities

Heath Visser, Michael Hart, Brendan Atkins, Michael Smith, Craig Hill, Jane Gun and Darren Bridges are authorised to provide advice on:

- Self-Managed Superannuation Funds

In addition, Brendan Atkins, Michael Smith, Craig Hill and Darren Bridges are authorised to provide the following financial services:

- Margin Lending

#### ARE THERE ANY SERVICES YOUR FINANCIAL ADVISER IS NOT AUTHORISED TO PROVIDE?

Heath Visser, Michael Hart, Michael Smith, Benjamin Sutherland, Brendan Atkins, Craig Hill, Jane Gun and Darren Bridges are not authorised to provide advice or services in the following areas:

- Derivatives
- Structured Investments

Heath Visser, Michael Hart, Benjamin Sutherland and Jane Gun are not authorised to provide advice or services in the following areas:

- Margin Lending

#### HOW CAN YOU PROVIDE YOUR INSTRUCTIONS TO ME?

You may provide instructions to me by using any of the contact details provided in Section 4 'Contact & Acknowledgment'.



## PRIVACY STATEMENT

In addition to the information provided in the Magnitude FSG Part 1 on how we collect, hold, use and disclose your personal information, and how we manage this information, further details around privacy are available at [www.halpinfs.com.au](http://www.halpinfs.com.au) and/or by calling us on 08 8236 8801.

## SECTION 3

### FEES AND CHARGES

#### HOW WILL YOUR FINANCIAL ADVISER BE PAID FOR THE SERVICES PROVIDED?

All fees and commissions disclosed in this FSG which are attributed to the services provided to you by Halpin Financial Services are paid to Magnitude. Magnitude will pay up to 100% of those fees and commissions to Halpin Financial Services for distribution as directed by the partners of Halpin Financial Services.

Where you are referred to us by one of our Joint Venture Partners, all fees and commissions received as a result of providing you with advice will be paid to the Joint Venture Partner. The Joint Venture Partner will then pay a distribution both to Halpin Financial Services and the Joint Venture partner. The distributions are made as follows:

- BSA Flinders Pty Ltd 22.5% / Halpin Financial Services 77.5%
- Gerhardy Whitelum Pty Ltd 20% / Halpin Financial Services 80%
- Hillier Ellis Chartered Accountants 20% / Halpin Financial Services 80%

The actual amount received by each party will be disclosed to you in your advice document.

Some Directors of Halpin Financial Services Pty Ltd are also shareholders of Implemented Portfolios Pty Ltd. As a result, some of the Halpin Financial Services Pty Ltd shareholders will participate in profit shares and distributions made by Implemented Portfolios Pty Ltd.

#### Payment on MLC Insurance Products

We may become eligible to receive a payment if we participate in MLC Ltd's Insurance Adviser Rewards Program. This payment is paid directly by MLC Limited and importantly does not alter the amount of premium payable by clients.

The Program is operated by MLC between 01/10/2016 to 30/09/2017 (Qualification Period) and applies to MLC Ltd products, being MLC Personal

Protection Portfolio, MLC Life Cover Super, MLC Protection First, MLC Insurance and MLC Insurance (Super) (MLC Products).

#### Determining the MLC Adviser Rewards Payment

At the completion of the program, we may be eligible to receive a payment calculated as follows:

Payment = \$1,500 x End of Year Business Value Measurement (BVM)

Note: The BVM is a cumulative score based on weighting allocated to each business metric of the Qualification Process below which will apply on 30 September 2017. The maximum BVM score is 100.

For example:

- If the BVM on 03/09/2017 is 75 then the adviser is entitled for a payment of \$112,500 (\$1,500 x 75) (inclusive of GST)
- If the BVM on 03/09/2017 is 100 then the adviser is entitled for a payment of \$150,000 (\$1,500 x 100) (inclusive of GST)

#### Qualification Process

The Business Value Measurement (BVM) allocated is based on how well we meet or exceed each of the following:

- Retaining more than 88% of MLC Products over the qualification period;
- Total premium in force over \$1 million;
- New business sales more than \$100,000; and
- More than a 65% usage rate for Riskfirst.

If the retention criteria outlined above is not met, we will not be eligible to receive a MLC Adviser Rewards Payment.

#### WHAT IS YOUR FINANCIAL ADVISERS FEE STRUCTURE?

**As part of detailed financial planning, there are costs to you at various stages of the process. Before making any recommendations, we will discuss and agree the fees with you.**

**Advice fees are inclusive of GST and payable by you at the following stages:**

- 1.) **Recommendation:** For having a personalised financial plan (SoA) prepared, a plan preparation fee (up to \$11,000) is payable. The actual fee will depend on the complexity of your situation and the time it takes to prepare personal financial advice for you.
- 2.) **Implementation:** We may charge a placement fee and/or implementation fee to implement the recommendations in your financial plan. These are payable when you decide to proceed with the implementation of any one or more recommendations that we provide to you. The actual fee will depend on the complexity of

your situation and the amount of funds invested, but will not exceed:

- a. \$5,500; or
- b. the maximum of entry fees or contribution fees specified in the Product Disclosure Statement (PDS) for the recommended product; whichever is the greater.

- 3.) **Ongoing Advice Service and Reviews:** If you choose to have us conduct a review of your financial plan to ensure that your financial strategies and financial products remain appropriate to you, you may be charged a review fee. If you choose to have us provide an ongoing advice service, you may be charged a fee of up to 1.8% p.a. of total funds under management.

Where a placement fee and/or implementation fee is charged, we may rebate all or part of the initial commissions and/or ongoing commissions received from a product issuer, by way of an increase in your investment amount.

Where we receive an initial commission and/or ongoing commission amount, we may rebate all or part of the implementation and/or placement fee to you.

**Note:** Full details of all fees and commissions for financial services will be provided to you in a Statement of Advice (SoA), or Record of Advice (RoA) and Product Disclosure Statements at the time of receiving any recommendation.

#### **WHAT OTHER BENEFITS DOES YOUR FINANCIAL ADVISER RECEIVE?**

**In addition to the remuneration detailed above, we are eligible to qualify for other benefits and entitlements as detailed below:**

- Conferences and educational events

#### **WILL YOUR FINANCIAL ADVISER BE PAID WHEN MAKING A REFERRAL?**

If you have been referred to us by an external party and you accept the services we provide, we may make a payment to the external party for that referral. Any amount payable will be disclosed in the SoA provided to you. This will be paid by me to the external party and will be at no additional cost to you.

**The partners of Halpin Financial Services have a relationship with Charter Capital Finance which provides mortgage broking and lending services. Magnitude has no involvement in these activities and is not responsible for any services, advice or products provided by this business.**

## SECTION 4

### CONTACT & ACKNOWLEDGMENT

#### HOW YOU CAN CONTACT YOUR FINANCIAL ADVISER

##### Adelaide Office

**Your Financial Adviser:** Phone: 08 8236 8801  
Halpin Financial Services Fax: 08 8212 9218  
Email: advice@halpinfs.com.au  
Website: www.halpinfs.com.au

##### Darwin Office

Phone: 08 8923 6969  
Fax: 08 8212 9218

#### ACKNOWLEDGMENT – CLIENT COPY

I/We acknowledge that I was/we were provided with the Magnitude Financial Services Guide Part 1 dated 9 November 2015 and Part 2 (Adviser Profile) dated 15/08/2017

Client name: \_\_\_\_\_

Client signature: \_\_\_\_\_ Date received: \_\_\_\_\_

Client name: \_\_\_\_\_

Client signature: \_\_\_\_\_ Date received: \_\_\_\_\_

OR complete as follows if Financial Services Guide is mailed to Client(s):

I confirm that I sent a copy of the Magnitude Financial Services Guide Part 1 dated 9 November 2015 and Part 2 (Adviser Profile) dated 15/08/2017 as follows:

Sent to (Client name(s)): \_\_\_\_\_

Sent on (Date): \_\_\_\_\_

Sent by (Name): \_\_\_\_\_

**ACKNOWLEDGEMENT – ADVISER COPY (to be retained on client file)**

I/We acknowledge that I was/we were provided with the Magnitude Financial Services Guide Part 1 dated 9 November 2015 and Part 2 (Adviser Profile) dated 15/08/2017.

Client name: \_\_\_\_\_

Client signature: \_\_\_\_\_ Date received: \_\_\_\_\_

Client name: \_\_\_\_\_

Client signature: \_\_\_\_\_ Date received: \_\_\_\_\_

OR complete as follows if Financial Services Guide is mailed to Client(s):

I confirm that I sent a copy of the Magnitude Financial Services Guide Part 1 dated 9 November 2015 and Part 2 (Adviser Profile) dated 15/08/2017 as follows:

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Sent by (Name): \_\_\_\_\_