# Financial Services Guide

## Invest Blue Direct Pty Ltd Trading as Ironbark Advice

Invest Blue Direct Pty Ltd (ABN 31 1278 616 61, ACN 127 861 661), trading as Ironbark Advice is an Authorised Representative (Authorised Representative number 321364) of LFC Group Pty Limited ("the Licensee").

References to "our", "we", "us", "me" and "I" refer to Invest Blue Direct Pty Ltd trading as Ironbark Advice.

This Financial Services Guide ("**Guide**") contains information that will help you decide whether to use the financial services we offer. It sets out:

- who we are and how to contact us
- the advice and services we provide
- information about the Licensee
- our fees and how we are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us.

This Financial Services Guide comprises of the following documents, which must be read together:

- **Part A –** Practice Profile (This Document).
- **Part B –** Adviser Profile.

### Not Independent

Generally, we provide personal advice in line with the Licensee's Approved Product and Services List (APSL) which may include financial products and services associated with the Licensee. We may receive commissions from life insurance products we recommend and non-monetary benefits such as training and educational seminars from product providers. For these reasons, we are not considered independent, impartial, or unbiased.

### Our contact details:


**Address:** Hanna's Building, Shop 1B/126 Beardy Street
Armidale NSW 2350

**Postal:** PO Box 677,
Armidale NSW 2350

**Phone:** 1300 346 837

**Email:** advice@ironbarkfg.com.au

**Website:** ironbarkfg.com.au

## Documents you may receive in the financial planning process

We will provide you with several documents as you progress through your financial planning and advice journey. We may provide these documents electronically to your nominated email address, unless otherwise agreed.

When we provide personal advice, it will normally be documented and provided to you in a Statement of Advice (SoA). The SoA contains a summary of your goals and the strategies and any financial products we may recommend to achieve your goals. It also provides you with detailed information about product costs and the fees and other benefits we and others will receive, as a result of our advice.

If we provide further personal advice an SoA may not be required. We will keep a record of any personal advice we provide you for seven years. You may request a copy of such records by contacting us during that period.

If we recommend or arrange a financial product for you, we will provide a Product Disclosure Statement (PDS), or Investor Directed Portfolio Services (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks, as well as the costs you will pay the product provider to manage that product. You should read any warnings in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

## Our advice and services

We are authorised to provide personal or general financial advice on:

- Wealth Accumulation
- Personal insurance
- Superannuation strategies and retirement planning
- Retirement income streams, including pensions and annuities
- Budget and cash flow management
- Centrelink and other government benefits.

We are authorised to provide advice on and arrange the following products:

- Superannuation
- Securities
- Retirement savings accounts
- Managed investment schemes including Investor Directed Portfolio Services (IDPS)
- Deposit and payment products, including basic deposit, non-basic deposit, and non-cash payment products
- Life Products – Investment life insurance
- Life Products – Life risk insurance (including life cover, income protection cover, total and permanent disability cover, and trauma cover)

Your adviser may also be authorised to advise on other specialist areas. These are listed in their adviser profiles.

## Transaction services

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice.

## Instructing us

You can give us instructions by telephone, mail, email, or other methods, as agreed with your adviser.

## Providing information to us

It is important that we understand your circumstances and goals, so that we can provide you with appropriate advice and services. You have the right not to provide us with any personal information. Should you choose to withhold information, or if information you provide is incomplete or inaccurate, the advice or services we provide you may not be appropriate for you.

It is also important that you keep us up to date by informing us of any changes to your circumstances so we can determine if our advice is still appropriate.

## Privacy Collection Statement

We are committed to protecting your privacy and outline below how we maintain the privacy of the information we collect about you.

As part of the advice journey, we need to collect information about you. Where possible we will obtain that information directly from you, but if authorised by you we may also obtain it from other sources such as your employer or accountant. If that information is incomplete or inaccurate, this could affect our ability to analyse your needs, objectives and financial situation, so our recommendations may not be appropriate or suitable for you.

We are also required to implement client identification processes under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006. We will need you to present identification documents such as passports and driver's licenses to meet our obligations.

We keep your personal information confidential and only use it in accordance with the Akumin Pty Limited (**Akumin**) Privacy Policy, and the Ironbark Financial Group (**Ironbark**) Privacy Policy. Some of the ways we may use this information are set out below:

- We, Ironbark and the Licensee may use this information to provide financial services to you, including passing on your details to third parties such as product issuers;
- We may disclose your information to other financial advisers, brokers and those who are authorised by the Licensee to review clients' needs and circumstances from time to time, including other companies within Akumin and Entireti;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist us, Akumin and Entireti to provide financial services to you. A list of countries where these service providers are located can be found in the Privacy Policy;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist us, Ironbark and Entireti to provide financial services to you. A list of countries where these service providers are located can be found in the Entireti Privacy Policy and Ironbark Privacy Policy;
- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (you can opt-out at any time); and
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

We, Ironbark and the Licensee will continue to take reasonable steps to protect your information from misuse, loss, unauthorised access, modification or improper disclosure. You can request access to the information we or the Licensee holds about you at any time to correct or update it as set out in the Akumin Privacy Policy. The Akumin Privacy Policy also contains information about how to make a privacy complaint. For a copy of the Akumin Privacy Policy visit http://www.akumin.com.au/privacy-policy or you can contact us.

You can request access to the information Ironbark holds about you at any time to correct or update it as set out in the Ironbark Privacy Policy. For a copy of the Ironbark Privacy Policy visit https://www.ironbarkfg.com.au/privacy-policy or you can contact us.

## Confidence in the quality of our advice

If at any time you are not satisfied with our services, the following will help you understand your options and find a resolution.

- Contact your adviser and tell them about your complaint.
- Alternatively, you can contact the Licensee at:
  - Phone 1800 812 388
  - Email **advicecomplaints@akumin.com.au**
  - Online at **www.entireti.com.au**
  - In writing to:
    **Attention: Advice Complaints Department**
    LFC Group Pty Limited
    Level 6, 88 Phillip Street
    Sydney NSW 2000 Australia

They will try to resolve your complaint quickly and fairly. They will provide you with a decision about your complaint within 30 days of us receiving it.

We note that in some circumstances, it may not be possible for us to completely resolve a complaint within this timeframe. If you do not agree with our decision in respect of your complaint, or are otherwise unsatisfied with our response, you may escalate your complaint to one of the following External Dispute Resolution Schemes.

| | |
|---|---|
| **Any issues about financial advice, investments, superannuation, insurance matters, or credit matters** | **Australian Financial Complaints Authority (AFCA)**<br>GPO Box 3,<br>Melbourne VIC 3001<br>1800 931 678<br>www.afca.org.au<br>info@afca.org.au |
| **Any issue about your personal information** | **The Office of the Australian Information Commissioner**<br>GPO Box 5218,<br>Sydney NSW 2001<br>1300 363 992<br>www.oaic.gov.au<br>enquiries@oaic.gov.au |

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

## Professional indemnity insurance

We maintain professional indemnity insurance to cover our advice and the recommendations provided by your adviser. The Licensee is also covered by professional indemnity insurance and this satisfies the requirements imposed by the Corporations Act 2001 and National Consumer Credit Protection Act. The insurance also covers claims arising from the actions of former employees or representatives of the Licensee, even where subsequent to these actions, they have ceased to be employed by or act for the Licensee.

## About the Licensee

LFC Group Pty Limited; ABN 35 644 576 965 Australian Financial Services Licensee; Licence No: 526600

Registered office is at Level 6, 88 Phillip Street, Sydney NSW 2000 Australia.

The Licensee has:

- Approved the distribution of this Guide
- Authorised us to provide advice and other services as described in this Guide.

## About Akumin Pty Limited & Entireti Limited

The Licensee is a subsidiary of Akumin Pty Limited.

Akumin Pty Limited is a subsidiary of Entireti Limited, a group that specialises in licensing and advice business services to financial planning practices and their clients.

AMP Limited holds a minority stake (currently 30%) in Akumin Pty Limited.

We can provide advice on products and services from a wide range of financial product and service providers, some of which are related or associated with the Licensee.

If we recommend a product issued by AMP Limited or a third-party product issuer, they will benefit from our recommendation by receiving product, administration and investment fees, as well as fees paid by fund managers to distribute their product. These fees are all disclosed in the relevant PDS or IDPS guide.

Salita Portfolio Services Pty Ltd, a wholly owned subsidiary of Entireti Limited, provides portfolio construction and investment services to third party product issuers and receives fees for those services.

Charter Financial Planning Limited, a subsidiary of Entireti Limited, also provides portfolio construction and investment services to third party product issuers and receive fees for those services.

Entireti Lending Solutions Pty Ltd, a wholly owned subsidiary of Entireti Limited, provides credit services to their clients and receives remuneration, including commissions, fees and other benefits for those services.

The Licensee maintains an APSL, from a diversified selection of approved Australian and International fund providers, including companies related to the Licensee. These have been researched by external

research houses as well as our in-house research team. The Licensee regularly reviews products and services to ensure they remain competitive with similar products that address similar client needs and objectives. Generally, we recommend products on the APSL. However, if appropriate for your needs, we may, subject to the Licensee's approval, recommend other products.

Authorised Representatives and/or staff employed in our business may hold shares in AMP Limited, whose share price may be favourably affected by the sale of products issued by AMP Group companies.

## Our fees

We will discuss and agree the actual fees with you before we proceed and where relevant the fees and commissions will be disclosed in the advice document provided to you. The following section outlines the types of fees that may apply.

The fees charged for our advice and services may be based on a combination of a set dollar amount, or a percentage-based fee. Our agreed advice and service fees may include charges for one off or regular fees. We may also receive initial or ongoing commissions from certain product providers.

### Licensee fees

Unless stated otherwise, all permissible revenue, including any advice and service fees and commissions will be paid to the Licensee. It will then pass on the amounts due to us through its payment system. The Licensee charges us a Licensee Fee each year. The Licensee Fee is determined as an annual amount based on a number of factors, including our business revenue, the number of advisers and/or accredited mortgage consultants in the practice and a practice fee.

### Other costs

Other costs may apply in the process of providing our advice and services to you. We will agree all additional costs with you prior to incurring them.

The following table outlines the range of fee we charge and should be used as a guide only. We will discuss your individual needs and agree our fees with you. The actual agreed fees will depend on factors such as the complexity of your circumstances and goals and the scope of the advice. All fees and charges include GST.

| Fee type and description |
|---|
| **Initial Service Fee** |
| These are fees paid when you have agreed to receive our advice.<br><br>Our initial fee is determined by the complexity of the advice being provided and the value added to you from the strategy.<br><br>**Starting from $1,980.00 (inclusive of GST).**<br><br>For consultation with a financial planner outside an initial or ongoing advice package, we charge an hourly rate.<br><br>**$660.00 per hour (inclusive of GST).**<br><br>For assistance with services/administration via our support staff outside an initial or ongoing advice package, we charge an hourly rate.<br><br>**$275.00 per hour (inclusive of GST)** |
| **Ongoing Service Fee** |
| If we enter an ongoing fee arrangement for a regular review of your financial planning strategy, the fee can vary depending on the level and complexity of service provided. Details of the services and fees will be set out in the agreement.<br><br>• **Flat Fee:** Starting from $1,980.00 (inclusive of GST),<br><br>**OR**<br><br>• **Percentage (%) Based Fee:** Ranging between 0.01% to 5.00% of the investment balance/funds under management.<br><br>***For example,*** *if your account balance was $100,000 and your fee was 0.99%, your fee would be $990.00.* |
| **Annual Advice and Service Fees** |
| You can elect to enter into a 12-month advice and services agreement as part of your financial planning strategy. The fee can vary depending on the level and complexity of service. Details of the services and fees will be set out in the agreement.<br><br>• **Flat Fee:** Starting from $1,980.00 (inclusive of GST) for a 12-month period,<br><br>**OR** |

| Fee type and description |
|---|
| • **Percentage (%) Based Fee:** Ranging between 0.01% to 5.00% of the investment balance/funds under management for a 12-month period. |

***For example,*** *if your funds under our management was $100,000 in total, assuming the balance remains constant, your fee for 12 months would range between $10.00 and $5,000.00. The amount of fees will depend on the service offering and these will be provided in a separate advice or services agreement.*

**Commissions**

**Insurance:**

- **Initial commissions:** Up to 66.00% of the first year's premium for new policies implemented from 1 January 2020. We may receive commissions on increases or additions to existing policies of up to 130.00%.
- **Ongoing commissions:** Up to 33.00% of the insurance premium each following year.

***For example:*** *On insurance policies implemented from 1 January 2020, if your insurance premium was $1,000, we would receive an initial commission of up to $660.00. We would receive an ongoing commission of up to $330.00 pa.*

## Other benefits we may receive

In addition to the payments explained above we may receive other monetary and non-monetary benefits, support services or recognition from the Licensee to help us grow our business. These are not additional costs to you. They could include training, badging rights, technology and technology support, marketing, financing, events or other recognition we are eligible for. We may receive benefits from product issuers that may include non-monetary benefits that are valued at less than $300. We may also participate in business lunches or receive corporate promotional merchandise tickets to sporting or cultural events and other similar items.

From time to time, Entireti Limited may facilitate access to the Licensee and us to be trained and educated by product issuers on their on their products.

### Personal and professional development

The Licensee provides personal and professional development opportunities such as education and professional development programs, offered annually to qualifying practices.

## Other business interests and relationships

Invest Blue Direct Pty Ltd is wholly owned by Invest Blue Finance Pty Ltd ACN 661 784 541 (**Invest Blue Finance**), which is a wholly owned subsidiary of Invest Blue Pty Ltd ACN 001 874 744 (**Invest Blue Parent**). These parent entities have extensive related body corporates, associations and relationships with other financial planning, credit, legal, insurance and aged care and accounting businesses.

Invest Blue Parent is ultimately a wholly owned subsidiary of Ironbark Investment Partners Pty Ltd ACN 136 679 215 (**Ironbark Financial Group**), which has interests in diversified financial services businesses, including Ironbark Investment Solutions, Ironbark Advice and Ironbark Private Wealth.

Invest Blue Direct Pty Ltd, through Invest Blue Parent, Ironbark Financial Group, its own associations, relationships and/or its related body associations and relationships, may receive benefits by referring you to our related companies, related party products and/or ancillary specialist services (including capability in relation to managed discretionary accounts). If this is applicable to you, we will only do this where this is in your best interest and we will disclose the entity, product or service where we may receive any additional benefit, or it is seen as a potential or perceived conflict in your advice documents such as your SOA or Record of Advice (ROA).

In addition to providing the services listed in this guide, we have the following relationships:

The Invest Blue Parent has 100% controlling interest in the following companies:

- **Ironbark Private Wealth**, comprising Paradigm Wealth Advisors Pty Ltd, Paradigm Advice Holdings Pty Ltd, Paradigm Wealth Management Pty Ltd, Spring Street Asset Management Pty Ltd, Lifewealth Pty Ltd, Avanti Financial Group Pty Ltd, Avanti Financial Advisors Pty Ltd and Mercury Private Pty Ltd who offer and provide comprehensive financial planning services;

- **Ironbark Advice**, comprising Beacon Aged Care and Retirement Advisers Pty Ltd who offer and provide comprehensive financial planning services;
- **Ironbark Advice Lending,** comprising Cornerstone Financial Group Pty Ltd and Mason Finance Group Pty Ltd, who offer and provide comprehensive mortgage broking services;
- **JSA** comprising Jeff Shakespeare & Associates Pty Ltd and JSA Accounting & Tax Pty Ltd, who offer and provide comprehensive financial planning, accounting and taxation services;
- **Paris Financial Services Pty Ltd**, who offer and provide comprehensive accounting, taxation and financial planning services.
- **Mercury Private Tax and Accounting Pty Ltd**, who offer and provide comprehensive accounting and taxation services;
- **Think Super Solutions Pty Ltd** who offer and provide Self-Managed Super Fund (SMSF) administration services.

The Invest Blue Parent has 50% controlling interest in the following companies:

- **Lifewealth Partners Pty Ltd** who offer and provide comprehensive accounting and taxation services.

As a result, we will benefit from fees, dividends or income received from those business's profits that may result from any payments or other benefits received in respect of the services provided to you.

The Licensee has no involvement in these activities and is not responsible for any services, advice or products provided by these businesses.

## Other relationships

In addition to providing the services listed in this Guide, we have relationships with various Legal Service providers. To execute Estate Planning strategies, we receive and refer clients to trusted third party Solicitors, who specialise in complex Estate Planning documents and structures. As part of our service, we remain involved in the Estate Planning process as a facilitator, to ensure that the strategy is actioned through to completion. LFC Group is not involved in these activities and is not responsible for any services, advice or products provided by these businesses.

## Our Referral arrangements

We may receive payments to refer you to other service providers. These amounts do not involve additional costs and will be disclosed to you at the time of referral. Our current referral arrangements are detailed below:

| Provider | Services | Payment arrangement |
|---|---|---|
| **AIA Health** | Private Health Insurance | AIA Health will pay a referral fee of 20% (plus GST) of the client's first year's premium, of which 16% (plus GST) will be passed on to us (the Practice), with the remaining 4% (plus GST) to be retained by the licensee).<br>***Example:*** *If the first year premium is $1,000, we will receive $160.00 and the Licensee will receive $40.* |

We may introduce you to Yodal Ptd Ltd to assist with your estate planning. While we may support you by facilitating the process, any legal advice will be provided via Yodal's legal panel and not by us. We will not receive a fee from Yodal to introduce you to them.

Where you have been referred to us by someone else, we may pay them a fee, commission or some other benefit in relation to that referral. Our current referral arrangements are detailed below:

| Provider | Payment arrangement |
|---|---|
| **Pinnacle Taxation Services** | If you are referred to us by Pinnacle Taxation Services for financial advice, we will pay Pinnacle Taxation Services 30% of any upfront commission or part of the fees for service paid by the Licensee, and 30% of any ongoing commission paid by the Licensee.<br>***Example:*** *If the upfront commission is $1,000, we will pay $300 upfront and if the ongoing commission is $1,000, we will pay $300 ongoing as a referral fee.* |
| **Shaw and Partners**<br>**Market Partners**<br>**Petrus Wealth Management**<br>**Solomons Wealth Management** | If you are referred to us by Shaw and Partners, Market Partners, Petrus Wealth Management or Solomons Wealth Management, we will pay 37.50% of any upfront commission of part of the fees paid to the Licensee, and 50% of any ongoing commission paid by the Licensee.<br>***Example:*** *If the upfront commission is $1,000, we will pay $375 upfront and if the ongoing commission is $1,000, we will pay $500 ongoing as a referral fee.* |
| **Next Transition Group** | If you are referred to us by Next Transition Group, we will pay 25% of any upfront commission of part of the fees paid to the Licensee, and 25% of any ongoing commission paid by the Licensee.<br>***Example:*** *If the upfront commission is $1,000, we will pay $250 upfront and if the ongoing commission is $1,000, we will pay $250 ongoing as a referral fee.* |

## Separately managed accounts (SMA)

A separately managed account (SMA) is an account where a responsible entity, based on advice from a professional investment manager, can make investment decisions on a client's portfolio and transact on those decisions without requiring the client's express consent each time. This means the responsible entity is responsible for the discretionary management of the client's investment portfolio.

We distribute the Cornerstone, Integrity, Drummond Capital Partners, Evidentia Group and DNR Capital Managed Portfolios, which are administered by MyNorth, BT Panorama and HUB24.

We are not the investment manager and have no relationship or association with the investment manager.

The responsible entity appoints a professional investment manager to advise on the SMA portfolio's management. The responsible entity makes all investment decisions relating to the SMA portfolios.

We have a relationship with Ironbark Asset Management Pty Ltd which acts as Responsible Entity as outlined below, which is also a wholly owned subsidiary of the Ironbark Financial Group. Please see "other business interests and relationships" section.

For more information about how the product works and the roles and responsibilities of the key parties, please refer to the relevant Managed Portfolio PDS which we provide to you if we recommend the SMA product to you.

### Fees

Other than the fees disclosed under 'Our Fees' above, we do not receive any other remuneration in relation to Managed Portfolios.

### Note

If you are no longer our client, the responsible entity may have the discretion to move your investments out of the Managed Portfolios.

### ABNs and Australian financial services licences (AFSL)

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|---|---|
| **Responsible entity** | NMMT Limited<br>ABN 42 058 835 573,<br>AFSL 234653 |
| **Investment manager** | Russell Investment Management Ltd<br>ABN 53 068 338 974,<br>AFSL 247185 |
| **Responsible entity** | Ironbark Asset Management (Fund Services) Limited<br>ABN 63 116 232 154,<br>AFSL 298626 |
| **Investment manager** | Russell Investment Management Ltd<br>ABN 53 068 338 974,<br>AFSL 247185 |
| **Responsible entity** | NMMT Limited<br>ABN 42 058 835 573,<br>AFSL 234653 |
| **Investment manager** | Pendal Institutional Limited<br>ABN 17 1263 906 27,<br>AFSL 316455 |
| **Responsible entity** | NMMT Limited<br>ABN 42 058 835 573,<br>AFSL 234653 |
| **Investment manager** | DNR Capital Pty Ltd<br>ABN 72 099 071 637,<br>AFSL 301658 |
| **Responsible entity** | NMMT Limited<br>ABN 42 058 835 573,<br>AFSL 234653 |
| **Investment manager** | Drummond Capital Partners Pty Ltd<br>ABN 15 622 660 182,<br>AFSL 534213 |
| **Responsible entity** | NMMT Limited<br>ABN 42 058 835 573,<br>AFSL 234653 |
| **Investment manager** | Evidentia Implemented Consulting Pty Ltd<br>ABN 52 666 387 917,<br>AFSL 546217 |
| **Responsible entity** | Ironbark Asset Management (Fund Services) Limited<br>ABN 63 116 232 154,<br>AFSL 298626 |

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|---|---|
| **Investment manager** | DNR Capital Pty Ltd<br>ABN 72 099 071 637,<br>AFSL 301658 |

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|---|---|
| **Responsible entity** | Ironbark Asset Management (Fund Services) Limited<br>ABN 63 116 232 154,<br>AFSL 298626 |
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