

Financial Services Guide

Part 1

Clarity Success Freedom Pty Ltd

ABN 20 614 940 537 **AFSL No.** 493340

31 Bay Street, Tweed Heads NSW 2485

PO Box 909 Coolangatta QLD 4225

t 07 55995747

e wealth@chgiw.com.au

w chgiw.com.au

This Financial Services Guide (FSG) comes in two parts, this document which is Part 1, and Part 2, the Adviser Profile.

Version 6

Date of issue: 25 June 2020



About CHG

CHG group is a collective of three wholly owned private companies, being:

CHG Wealth Pty Ltd ABN 30 607 334 298 is the wealth management business and Corporate Authorised Representative of Clarity Success Freedom Pty Ltd ABN 20 614 940 537 Australian Financial Services Licence (AFSL) No. 493340,

CHG Integrated Wealth Pty Ltd ABN 15 156 337 576 is the accounting business, and

CHG Finance Pty Ltd ABN 63 605 956 205 is the finance business.

Our focus is to help you achieve your financial goals with the simplicity of providing expert advice all under this collective group.

About Clarity Success Freedom Pty Ltd

CHG Wealth Pty Ltd (CHG Wealth) ABN 30 607 334 298 is a Corporate Authorised Representative of Clarity Success Freedom Pty Ltd (AFSL) No. 493340.

Our advisers are employees of CHG Wealth Pty Ltd and receive a salary.

CHG Wealth Pty Ltd, and Clarity Success Freedom Pty Ltd has the same shareholders as Integrated Wealth Pty Ltd.

References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Clarity Success Freedom Pty Ltd, CHG Wealth or your 'Authorised Representatives', as the context requires.

Clarity Success Freedom Pty Ltd is a Member of the Financial Planning Association of Australia (FPA) and actively supports the FPA Code of Ethics and Professional Conduct.

Clarity Success Freedom Pty Ltd Authorised Representatives adhere to the rules as determined by the Financial Adviser Standards and Ethics Authority (FASEA). FASEA is established under the Corporations Act and sets the education, training and ethical standards of licensed financial advisers in Australia.

Your Adviser

Your Adviser is an Authorised Representative of Clarity Success Freedom Pty Ltd. They will be acting on behalf of Clarity Success Freedom Pty Ltd when they recommend financial products to you.

Your Adviser is an employee of CHG Wealth Pty Ltd and receives a salary.

Clarity Success Freedom Pty Ltd is responsible for any of the financial services provided, including the distribution of this FSG. You should also receive and read Part 2 of this FSG, the Adviser Profile, with this Part 1 of the FSG. Part 2 provides more detailed information about your Adviser.

About this guide

This Financial Services Guide (FSG) contains important information about the financial services available to you. Clarity Success Freedom Pty Ltd holds an AFSL, under which your Adviser operates as an authorised representative. This FSG outlines the services that both your Adviser and Clarity Success Freedom Pty Ltd offer you and aims to assist you in deciding whether to use the services available to you. It contains information including:

- who we are and how we can be contacted;
- the financial services we can provide;
- how we and other relevant parties are paid;
- how we manage any potential conflicts of interest;
- how we protect your privacy; and
- our dispute resolution procedures if you have a complaint.

When you receive personal financial advice your Adviser will provide you with a Statement of Advice (SOA). This contains details of the advice provided, the basis on which it was given and information about fees, commissions and associations which may reasonably be expected to be capable of influencing the provision of the advice. However, your Adviser has an overriding obligation to act in your best interests.

If your Adviser provides you additional advice, and that further advice is related to what was included in your previous SOA (and is not provided to you in writing), you may request a copy of the record of that further advice (ROA) or previous SOA at any time for up to seven years from the date your Adviser gave that further advice to you. You can request these by contacting your Adviser or Clarity Success Freedom Pty Ltd.

In some circumstances your Adviser will provide general financial product advice. In these situations, your Adviser will provide a warning that the advice does not take into account your personal objectives, financial situation or needs. In these circumstances, you will not be provided with an SOA.

When you receive personal or general advice to acquire a particular financial product, your Adviser will provide you with a Product Disclosure Statement (PDS). This contains information about a particular product and will assist you in making an informed decision about that product. If you ask to purchase a specific product you will be provided with the appropriate PDS.

This FSG has been authorised for distribution by Clarity Success Freedom Pty Ltd.

Advisory services

Clarity Success Freedom Pty Ltd may provide the following advisory services:

- Financial Advisory/Planning
- Cashflow and Debt Management (strategy only)
- Insurance and Estate Planning Advice
- Investment Advice
- Gearing and Margin Lending advice
- Superannuation Advice
- Retirement Planning Advice
- Aged Care Advice

A financial product will only be recommended to you after it is considered suitable for your individual needs, objectives and financial circumstances.

Clarity Success Freedom Pty Ltd is authorised to provide financial product advice and deal in the following areas:

- Basic Deposit Products
- Deposit Products other than Basic Deposit Products
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Life Insurance – Risk
- Life Insurance – Investments
- Managed Investment Schemes (including Investor Directed Portfolio Services)
- Retirement Savings Accounts
- Securities
- Standard Margin Lending facilities
- Superannuation

The Adviser Profile sets out which of these financial services your Adviser is authorised to provide as an authorised representative of Clarity Success Freedom Pty Ltd.

Clarity Success Freedom Pty Ltd and its advisers are registered as appropriate with the Tax Practitioner's Board as a Tax (Financial) Adviser.

A Tax (Financial) Advice service is:

- Provided in the context of the advice provided by a financial adviser under an AFSL; and
- The part of financial advice that interprets and applies the tax laws (including tax, superannuation and SMSF laws) to the personal circumstances of a client.

Clarity Success Freedom Pty Ltd and its advisers are not registered tax agents and only provide services directly related to the nature of the advice provided to you under its licence. We recommend you consult a registered tax agent to confirm your taxation position for matters beyond the scope of this advice.

Clarity Success Freedom Pty Ltd also has access to specialist advice on tax and estate planning. Where required, these specialist areas of advice will be provided only by referral. Whether you use the specialist referred to you, or a professional that you currently have an involvement with, they will be responsible for the advice provided to you.

If you require advice on a wider range of products or complex issues you may be referred to another financial services provider.

Your Adviser's responsibilities to you

Your Adviser will:

- where personal advice is given, act in your best interests and only provide personal advice that they reasonably consider is appropriate, having regard to your personal circumstances;
- where personal advice is given, give priority to your interests if a conflict exists between your interests and the interests of your Adviser, Clarity Success Freedom Pty Ltd, or an associate of these;
- generally only advise within Clarity Success Freedom Pty Ltd approved product list (APL). A range of financial products offered by many leading financial product providers are available to our advisers when they provide personal advice. 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;
- When providing personal advice to you, our advisers may only recommend a product to you if they consider it is appropriate after considering your objectives, financial situation and needs. Your adviser is not required to tell you about products that are not on the APL;
- deal if directed but only with your approval;
- take instructions from you either verbally, in written form (inc email), or digitally;
- subject to any registration rules which may be applicable, consider but not advise on tax issues other than as a Tax (Financial) Adviser; and
- not ask you to sign blank documents.

Your responsibilities to your Adviser

It is expected that you will:

- when you are seeking personal advice, tell your Adviser about your personal objectives, current financial situation and any other relevant information so they can offer you the most appropriate advice. If you do not, the advice you receive may not be appropriate to your needs, objectives and financial situation;
- where required, provide your Adviser with complete and accurate information;
- update your Adviser as required with any changes in your personal situation;
- not sign blank forms;
- carefully consider their advice when making decisions about financial products; and
- carefully consider the implications or risk associated with any recommendations in your SOA before making a decision relating to a financial product.

Fees and Commissions

Our fees are determined by the nature and complexity of the advice we provide you. This section outlines the fees and commissions we may receive.

Initial Advice Fees

Fees are charged for preparation of your plan and implementation of our advice. Fees are calculated according to the complexity of the advice and support structure required in delivering the achievement of your goals.

Total initial fees (includes plan and implementation fees) may range from \$2,000 to \$30,000 (inclusive of GST) however may exceed these ranges for particularly complex situations.

Ongoing Advice Fees

The fee for our ongoing advice services will be subject to the final strategies implemented and your ongoing requirements. These will be detailed in the Ongoing Service Arrangement which is reconfirmed by clients annually.

Ongoing fees relate to providing advice on your cashflow, investing, debt management, superannuation, tax efficiency, effect of legislation, personal insurances, estate planning and ongoing management of your investment. They may be a combination of a flat dollar fee and percentage of the balance of funds we manage on your behalf. They are detailed as follows:

- The flat-dollar fee typically ranges between \$2,000 and \$20,000 per annum (including GST);
- The dollar-based fee can be up to 1.1% p.a. of assets under advice (including GST). For example, if your fee was 1.1% and you invested \$200,000 with us, your investment strategy fee would be \$2,200 per annum (including GST).

The actual fee will be quoted to you prior to you agreeing to proceed with the preparation of an SOA.

Commissions

We may receive an upfront commission from the product issuer if you decide to buy a life risk insurance product we recommend to you.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), we may receive up to 40% (excl. GST) of your annual policy cost.

From 1 January 2020, we may receive an upfront commission of between 0% and 66% of the first year's annual premium, and then an annual ongoing commission of between 0% and 22% of the annual premium. For policies taken out prior to 1 January 2020, the upfront commission may have been between 0% and 130% and from 0% to 33% ongoing. For example, if you took out a policy after 1 January 2020, your annual premium was \$2,000, and we received 66% (inc GST) of your premium upfront and 22% (inc GST) ongoing, this equates to \$1,320 upfront and \$440 per year for as long as you hold the product (incl GST).

Referral Fee

If you are referred to us by CHG Finance, we may pay a referral fee of 30% of the plan fee (including GST). For example if your plan fee is \$5,000, we will pay CHG Finance \$1,500.

If we refer you to CHG Finance, we receive 30% (including GST) of the upfront commission paid to them. For example, if CHG Finance receive \$5,000 on settlement of your successful loan application, they will pay us \$1,500.

These fees are not an additional cost to you.

We may provide referrals to other professionals who continue to provide quality advice to our clients. We may also receive referrals from other professionals (i.e. accountants, solicitors) and existing clients. For referrals outside CHG Finance, we do not pay for, nor receive any benefits.

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 up to \$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.

Disclosures

Details of any fees, commissions or other benefits that we, Clarity Success Freedom Pty Ltd 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.

Fees and commissions are payable (as directed by your Authorised Representative) to the Corporate Authorised representative, CHG Wealth Pty Ltd. CHG Wealth Pty Ltd pays a licensee fee to Clarity Success Freedom Pty Ltd for use of its AFSL services.

Your adviser receives a salary as an employee of CHG Wealth. Some of our advisers are additionally entitled to profit share as shareholders of CHG Wealth as determined by the Board from time to time.

If your Adviser only provides general advice, you can request further details about how remuneration is calculated, provided you do so within a reasonable time after receiving this FSG and before you receive a financial service.

If your Adviser recommends a financial product, the issuer of that product will receive a benefit which may be in the form of a premium or management fee. This is fully explained in the relevant PDS.

If personal advice is provided, when you are happy with the recommendations and information in your SOA or ROA, you need to authorise your Adviser to implement the recommendations by signing the original document or providing your signature digitally.

Your information and privacy

We collect, use, disclose, secure and manage your personal information in accordance with the Privacy Act 1988 (Cth), the 13 Australian Privacy Principles and any relevant privacy codes. Clarity Success Freedom Pty Ltd is well aware of the importance of maintaining the confidentiality of the personal information you disclose to your Adviser and we take all reasonable steps to handle the information you provide in accordance with your expectations and our obligations.

Generally your personal information is collected for the purpose of providing our financial services to you such as providing you with financial advice and access to products you may require. The way in which your information is collected, used and disclosed is explained in the Clarity Success Freedom Pty Ltd Privacy Policy. You can access this at chgiw.com.au or by contacting Clarity Success Freedom Pty Ltd you can obtain a copy free of charge. The accuracy of the information you provide is important. If you need to update or correct any information, please let your Adviser know.

From time to time we may disclose your personal information to other individuals and organisations in connection with providing products and services to you.

Generally you are entitled to obtain access to the information which we hold about you, subject to limited exceptions and should you require access to information you can either contact your Adviser or Clarity Success Freedom Pty Ltd directly.

If you have any questions regarding the privacy of your personal information or questions about our information handling practices you can contact us to discuss. However, should you want to know more about privacy rights and other privacy issues, there are a number of useful resources available at the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Anti-Money Laundering and Counter-Terrorism Financing Act 2006

Clarity Success Freedom Pty Ltd has a number of obligations under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), "AML/CTF obligations".

These AML/CTF obligations may require us to carry out procedures to identify you and to verify the identification information you provide. In some circumstances, AML/CTF obligations require us to report certain information about our clients to relevant authorities, including the Australian Transaction Reports and Analysis Centre (AUSTRAC). Where legally permitted or obligated to do so, we may disclose that information to regulatory or law enforcement agencies, to our related bodies or to other third parties.

The AUSTRAC website at www.austrac.gov.au provides information relating to the AML / CTF obligations.

Professional Indemnity

Clarity Success Freedom Pty Ltd has Professional Indemnity insurance as such its employees and its representatives are indemnified under Professional Indemnity insurance. That insurance covers work done for Clarity Success Freedom Pty Ltd, by its representatives and employees. These arrangements satisfy the compensation requirements for an AFS licensee under section 912B of the Corporations Act.

If you have any concerns or complaints

At Clarity Success Freedom Pty Ltd we strive to ensure that you are satisfied with the services we provide. However, we acknowledge that there may be instances, from time to time, where individuals may have some concerns, or be dissatisfied, with the services we deliver. If this is the case, we encourage you to:

1. Contact your adviser in the first instance. It's our experience that many concerns or complaints arise from miscommunication and can usually be resolved through consultation with your Adviser.
2. If the matter is not satisfactorily resolved in 5 days, or if you would prefer to contact us directly to discuss the issue, we have an internal complaints process through which we may review and seek to address your concerns. In these circumstances your complaint will be escalated to our Responsible Manager:

Responsible Manager
Clarity Success Freedom Pty Ltd
PO Box 909 Coolangatta QLD 4225
t 07 5599 5747
e wealth@chgiw.com.au

Clarity Success Freedom Pty Ltd will aim to resolve your complaint quickly and fairly and will communicate our proposed solutions to the issue with you, in writing within 45 days of receipt of your complaint at the address detailed below (or 90 days in cases where we have notified you that we require 90 days to resolve your complaint and you have agreed).
3. If you remain dissatisfied with the outcome provided by our internal complaints process, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers. Clarity Success Freedom Pty Ltd is bound by the determinations made by AFCA.

The AFCA contact details are set out below:

Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001
t 1800 931 678 (free call)
e info@afca.org.au
w www.afca.org.au



Further enquiries

If you have any further questions about the financial services outlined in this FSG, please contact your Adviser in the first instance. Alternatively, you can contact Clarity Success Freedom Pty Ltd on 07 5599 5747.

Please retain this document for your reference and any future dealings with your Adviser or Clarity Success Freedom Pty Ltd.

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 that Australia's financial markets are fair, 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
t 1300 300 630
w www.asic.gov.au

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 NSW 2001
t 1300 626 393
w www.fpa.asn.au

Financial Services Guide



Part 2- Adviser Profile

Prepared on 25 June 2020

This Adviser Profile is Part 2 of the Financial Services Guide (FSG) and should be provided to you with FSG Part 1. These two documents (Part 1 and 2) complete the FSG and have been authorised for use by Clarity Success Freedom Pty Ltd.

This Adviser Profile sets out my contact details, professional details, the services and products I provide and how I am paid. Most importantly it's a snapshot of who I am and how you can contact me.

Saul Muscardin

Authorised Representative: 1262979

My Details

CHG Wealth Pty Ltd
31 Bay Street, Tweed Heads, NSW 2485
PO Box 909, Coolangatta QLD 4225
t 07 5599 5747
f 07 5599 5810
e smuscardin@chgiw.com.au

About Me

I am an authorised representative of CHG Wealth Pty Ltd (authorised representative number 1238774), a corporate authorised representative of Clarity Success Freedom Pty Ltd (AFSL No. 493340), and provide financial services on its behalf.

I receive a salary as an employee of CHG Wealth Pty Ltd. Please refer to part 1 of the FSG for full details on fees and remuneration relevant to the advice I may provide.

My Experience

I come from a background in business, where I scrutinised operations to produce new efficiencies, and ultimately deliver greater profits to owners. As a financial adviser, I love applying the same rigour to the 'financial operations' of everyday Australians so they can achieve clarity, success, and freedom. I work with clients on cashflow, debt, reduction, insurance, super, and have a particular passion for investment strategies.

My Qualifications

- Graduate Diploma of Financial Planning
- Certificate IV Finance & Mortgage Broking
- Margin Lending
- Statement of Attainment: Self Managed Superannuation Funds

My Services

I am authorised to provide the following services:

- Financial Advisory/Planning
- Cashflow and Debt Management (strategy only)
- Insurance and Estate Planning Advice
- Investment Advice
- Gearing and Margin Lending Advice
- Superannuation Advice
- Retirement Planning Advice
- Aged Care Advice

I am authorised to provide financial product advice and deal in the following product types:

- Basic and non-basic deposit products
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Life Insurance - Risk and Investment products
- Managed Investments including Investor Directed Portfolio Service (IDPS)
- Retirement Savings Accounts
- Superannuation including Self Managed Superannuation Funds
- Margin Lending Facilities
- Securities

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Rebecca Humphreys

Authorised Representative: 1233377

My Details

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31 Bay Street, Tweed Heads, NSW 2485
PO Box 909, Coolangatta QLD 4225
t 07 5599 5747
f 07 5599 5810
e bhumphreys@chgjw.com.au

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My Experience

I have 19 years' experience in financial services and am passionate about helping clients take the stress out of managing their finances and helping them achieve their goals. I truly believe that financial freedom does not have to be a pipe dream if you are willing to pursue and embrace it. With a little discipline, and with the support and knowledge of a financial partner, you and your family can achieve your goals, live your dreams and have peace of mind while you enjoy all of the wonderful experiences that life has to offer.

My Qualifications

- Diploma of Financial Services (Financial Planning)
- Diploma of Finance and Mortgage Broking Management
- Margin Lending - Knowledge and Skills
- Accredited Aged Care Professional

My Services

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- Financial Advisory/Planning
- Cashflow and Debt Management (strategy only)
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Lisa Kirk 

Authorised Representative: 1004668

My Details

CHG Wealth Pty Ltd
31 Bay Street, Tweed Heads, NSW 2485
PO Box 909, Coolangatta QLD 4225
t 07 5599 5747
f 07 5599 5810
e lkirk@chgiw.com.au

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My Experience

I have 14 years' experience in financial services ranging from corporate to boutique practice level with the latter providing me with the most satisfaction. I am passionate about empowering clients to define their own path to financial success by providing the right framework, simplifying the complex and providing the right support and guidance to help my clients live their best life.

My Qualifications

- CERTIFIED FINANCIAL PLANNER®
- Bachelor of Business
- Advanced Diploma of Financial Services (Financial Planning)
- Statement of Attainment – Self-Managed Super Funds
- Margin Lending and Geared Investments
- Accredited Listed Product Adviser Program

My Services

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