Financial Services Guide

Part 1

Clarity Success Freedom Pty Ltd

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

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About Clarity Success About this guide Freedom Pty Ltd

CHG Wealth Pty Ltd (CHG Wealth) ABN 30 607 334 298 is a wealth management business focused on helping you achieve your financial and lifestyle goals - moving from uncertainty to clarity, success freedom.

CHG Wealth is a Corporate Authorised Representative of Clarity Success Freedom Pty Ltd (AFSL) No. 493340.

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.

Lack of Independence

Clarity Success Freedom Pty Ltd receives commission on the sale of life risk insurance products in lieu of an advice fee, and has an approved product list, which limits the range of products Clarity Success Freedom Pty Ltd or its representatives can recommend when providing advice to you. As such, we are neither independent, impartial, or unbiased as defined in Section 923A of the Corporations Act.

Your Adviser

Freedom Pty Ltd. They will be acting on behalf of Clarity Success Freedom Pty Ltd when they recommend financial products to you.

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

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.

Clarity Success Freedom Pty Ltd Adviser's 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.

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 advice costs, 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 vou

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.

Advice Costs and Commissions

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

Initial Advice Costs

There is a cost for the preparation of your plan and implementation of our advice. Costs are calculated according to the complexity of the advice and support structure required in delivering the achievement of your goals.

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

Ongoing Advice Costs

The cost for our ongoing advice services are based on the complexity of your situation, the strategies implemented and your ongoing advice requirements. These will be detailed in the Ongoing Service Arrangement which is reconfirmed by clients annually.

Your ongoing advice costs is a flat dollar amount typically ranging between \$2,200 and \$22,000 per annum (including GST) however may exceed these ranges for particularly complex situations.

Prior to 15 October 2020, there were two components of your ongoing advice costs, being a flat dollar amount of between \$2,000 to \$20,000 per annum, plus up to 1.1% per annum of the account balance we managed on your behalf (including GST). For example, if you invested \$200,000 with us, your cost could be:

- Flat dollar cost for the advice was agreed at \$4,000, and
- 1.1% cost on the \$200,000 you invested, being \$2,200.

Total ongoing costs would be \$4,000 plus \$2,200 = \$6,200 per annum (including GST).

The actual amount 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 Fees

If you are referred to us by HHFG Pty Ltd trading as Harrison & Harrison Financial Group, or Harrison & Harrison Finance Pty Ltd trading as Harrison & Harrison Finance, we may pay them a referral fee of 30% of the initial fee (including GST). For example, if your initial fee is \$5,000, we will pay a referral fee of \$1,500.

If you require tax advice, we may refer you to Pacioli Co Investments Pty Ltd trading as CHG Integrated Wealth. This is an associated business through a common shareholder. Any advice provided by this business is provided independent of Clarity Success Freedom Pty Ltd.

We may refer you to other professionals who continue to provide quality advice to our clients. We may receive a referral fee from these professionals. Details of the benefits we receive will be disclosed to you at the time of referral.

These fees are not an additional cost to you and are not paid by or to your adviser.

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 costs, 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.

Advice costs, 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 Professional 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.

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

If you have a complaint, you can contact us and discuss your complaint and review our public complaints policy on our website found at https://chgiw.com.au/complaints-policy/.

Please contact the Responsible Manager of our Licensee using any of the contact details at the start of this FSG. We will try and resolve your complaint quickly, fairly and within prescribed timeframes.

If the complaint cannot be resolved to your satisfaction within 30 days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

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



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

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

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.

Financial Services Guide



Part 2- Adviser Profile

Prepared on 30 September 2021

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.



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

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 and profit share as a shareholder of CHG Wealth as determined by the Board from time to time.

Please refer to part 1 of the FSG for full details on advice costs and remuneration relevant to the advice I may provide.

My Experience

I have 15 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

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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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

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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
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- Retirement Planning Advice
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- 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