

Count Financial Limited

Financial Services Guide

ABN 19001 974 625 | AFSL NO 227232

Version number 17.00

The purpose of this Financial Services Guide

This Financial Services Guide (FSG) is for Count Financial Limited ABN 19 001 974 625 ('Count') and is an important document designed to provide you with information to make an informed decision about the advice and services that Count provides.

Count ('we', 'us' or 'our') provides financial services through its Australian Financial Services Licence (AFSL No. 227232).

Your Count Financial Adviser ('Adviser') provides financial planning services to you as an Authorised Representative of Count. Your Adviser acts on behalf of Count which means that we are responsible for the services outlined in this FSG.

Your Adviser will operate under one of Count's franchisees. Our franchises nominate the Advisers that Count appoints as Authorised Representatives for the purpose of providing financial advice.

This FSG is divided into two parts and both parts must be read in conjunction as together they form the full FSG. Part One of this FSG provides high level disclosure of the financial services and products provided by our Group whereas Part Two of this FSG more specifically outlines the financial services and products provided by your Adviser, as well as more detail about the franchise for which they work.

Contacting us

If you need to contact us, you can speak with your Adviser or we can be reached using the following details:

Writing:	Count Financial Limited GPO Box 3323 Sydney NSW 2000
Phone:	1300 650 432

Part One

Part One of this FSG provides information about:

- Count and who we are
- Our relationships or associations with other entities
- Other disclosure documents you may receive
- The financial services and types of products we provide
- Collecting your personal information and providing us with instructions
- Fees or costs that may apply to you
- Remuneration that we, your Adviser or a related entity may receive, and
- What you can do if you are not happy with our services.

1. About Count Financial Limited

At Count our purpose is to help Australians afford their dreams. Our Advisers educate clients and help them make informed decisions about their future. So whether you are just starting out or approaching retirement, our Advisers assist you by providing you with a financial plan which gives you greater control over your financial future.

Our relationship with the Commonwealth Bank Group

We are a wholly owned, but non-guaranteed subsidiary of the Commonwealth Bank of Australia, one of Australia's largest financial services organisations.

We have associations with and may deal or provide advice on products issued by a range of financial product providers or services issued by a range of entities, some of which include the following entities within the Commonwealth Bank Group:

Avanteos Investments Limited
Australian Investment Exchange Ltd (AUSIEX)
BankWest, a division of Commonwealth Bank of Australia
The Colonial Mutual Life Assurance Society Limited (CMLA trading as CommInsure)
Colonial First State Investments Limited
Commonwealth Bank of Australia (CBA)
Commonwealth Securities Limited (CommSec)
Finconnect (Australia) Pty Ltd Australian Credit Licence No. 385888
Realindex Investments Pty Limited

Count has a significant shareholding in Countplus Limited ABN 11 126 990 832 (Countplus). Countplus owns 100% of Pacific East Coast Pty Ltd ABN 87 003 135 617.

Class Super is Count's preferred third party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count receives 17.5% of the annual software licence fee.

We are a Professional Partner of the Financial Planning Association of Australia (FPA). The FPA is the professional association for qualified financial advisers in Australia and we are committed to its Code of Ethics and Code of Professional Conduct.

2. Disclosure documents

You may receive the following documents when your Adviser provides financial services to you.

Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs you will receive a SoA. The information contained in the SoA will help you make an informed decision in relation to the advice provided. It also sets out the advice, the reasons for the advice and details about any remuneration payable.

Record of Advice (RoA)

If you were previously issued with a Count SoA, certain circumstances may allow the provision of further advice without the need for another SoA. Where this is the case, you are entitled to request a RoA within seven (7) years after the advice was provided. The RoA can be requested from your Adviser and will detail the further advice and the basis of those recommendations.

Additionally, in certain circumstances where you are provided advice on a small investment balance or strategy advice only, you may be issued with a RoA. Your Adviser is required to provide you with a copy of the RoA in this circumstance, which will outline the advice, the reason for the advice, and details about any remuneration payable.

Product Disclosure Document (PDS)

You will receive a PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product on your request. The PDS contains information about a financial product's features, fees, benefits and risks.

3. Advice services and products we offer

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

Advice services we provide

Our licence can provide advice in the following areas:

- Basic deposit products
- Life insurance
- Government debentures, stocks and bonds
- Managed investment schemes
- Securities
- Superannuation, and
- Standard margin lending.

Count is registered with the Tax Practitioners Board as a Registered Tax (Financial) Adviser. Based on the information collected from you, your Count Adviser will consider the tax consequences that relate directly to the financial advice being provided. However this financial advice will not include an assessment of your overall tax position. To determine how your Count Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or claim entitlements that arise, or could arise, under a taxation law.

Financial product types we recommend

Based on the advice services we are authorised in, examples of the types of products that we are able to provide advice on include:

- Savings accounts and term deposits
- Insurance (life cover, total and permanent disability cover, trauma cover, income protection and business overheads insurance)

- Treasury bonds and notes
- Managed funds and pooled investments
- Listed shares and exchange-traded funds
- Retail superannuation funds, Self-Managed Superannuation Funds and Retirement Savings Accounts, and
- Margin loans.

Approved products

Our specialist product research team undertakes due diligence on product providers and also use independent research providers to select a range of high quality products worthy of recommendation to our clients.

While other products may also be suitable to your needs, your Adviser will generally only provide advice on products that are listed on the Count Approved Product List ('Count APL').

The Count APL contains both Commonwealth Bank Group products and financial products issued by other providers external to the Group. All products must meet our rigorous selection criteria and approval process to be listed on the Count APL.

Depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the Count APL. If this happens, any product that your Adviser may recommend needs to meet our selection criteria and approval process. The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

In some instances, your Adviser may seek portfolio research advice from CommSec Adviser Services and incorporate this research into the advice that they provide to you. The cost of this advice will be incorporated into the total advice fee and detailed in your SoA.

Services we are not responsible for

We are only responsible for those financial services or products offered by your Adviser in their capacity as an Authorised Representative of Count. This does not include any other services your Adviser may provide in any other capacity, including as an accountant or tax agent, such as:

- Taxation advice and services, eg completing tax returns
- Accounting and audit services
- Self-Managed Super Fund compliance and administration services
- Business or legal advisory services and referrals
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, solicitor's or other mortgage schemes, derivatives, general insurance or direct international share holdings, and
- Any other services not provided as a franchisee of Count.

In all your dealings with your Adviser you must satisfy yourself as to who is responsible for the advice or services provided to you. If you require further clarification, please do not hesitate to contact Count.

4. Your personal information and providing us with instructions

How we handle your personal information

Count and your Adviser are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality we have adopted the principles set out in the Privacy Act 1988. For further details you can refer to the

Commonwealth Bank Group's Privacy Policy which is available from the security centre page at <https://www.commbank.com.au/security-privacy/general-security/privacy.html>

We may share your information with other members of the Commonwealth Bank Group. We may also share your information with others for reasons mentioned in Section 4 of the Group's Privacy Policy. Please refer to Sections 4 and 5 of the Group's Privacy Policy for more information around why your information may be shared and who we may share it with.

If you wish to review your personal information held by Count, please contact us by phoning 1800 026 868 or emailing privacy@count.com.au

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as your passport or driver's licence. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

Instructing your Adviser

You will generally need to instruct your Adviser in person and your signature will be required for verification. For some products and services though, special arrangements can be put in place to instruct your Adviser by electronic means, for example phone, e-mail or fax.

Non-advisory transactions

At times you may wish to make an investment transaction and do not need assistance from us with any decisions in relation to the product or transaction. In these cases, we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without advice from us we will ask you to confirm your instructions in writing and sign an acknowledgment form. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

5. Our fees and other costs

Financial planning advice fees

The fees or other costs that your Adviser may charge for services provided or products recommended, depends on the nature and complexity of your situation and the advice that is provided.

Your Adviser will agree with you the form and amount of charges before they provide any advice or services. The general way you pay for our services is through our financial planning advice fees or commissions.

The methods are explained below and the actual costs will be disclosed in your Adviser's written advice to you or in the acknowledgment form completed when a transaction is requested. You have the right to request further information in relation to the remuneration, the range of amounts or rates of remuneration that we or your Adviser may receive.

The fees and charges for our advice and service may be based on a dollar amount, a percentage of the amount invested, an hourly rate, or any combination of these.

Where we are aware that you have used borrowed funds to invest through us, we will charge you a flat dollar advice fee.

Our financial planning advice fees generally include charges for providing you with a SoA, ongoing advice and services, or it can be for other fees, such as a fee for a transaction. You may choose to pay these fees directly or from the product(s).

Please refer to Part Two of this FSG for further details on fees that your Adviser charges.

Commission payments

When you invest in a product or commence an insurance policy through us, we may receive initial or ongoing commission payments from product providers.

An initial commission is a one-off payment made upon entry to a financial product and an ongoing commission is paid each year for which a financial product is maintained.

These commissions are based on a percentage of the funds you invest, or the premiums you pay. They are not paid directly by you and are instead deducted from the investment, superannuation, loan or insurance premium by the product provider. We only receive commission where we are entitled to receive these payments through existing arrangements with product providers.

If you are charged a direct fee, your Adviser may rebate some or all of the above commission to you.

Investment, superannuation and loan products

The initial commission we receive on an investment, superannuation or loan product may be up to 4.40% of the investment amount. The ongoing commission we receive may be up to 1.50% per annum.

We will only receive commission payments on investments, superannuation or loan products, or additional contributions or drawdowns to these products, where we are entitled to.

Life insurance products

Additional cover added to an existing product which was issued before 1 January 2018

The initial commission we receive on insurance products may be up to 123.75% of the first year's premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

New products issued on or after 1 January 2018

The initial commission that Count Financial may receive on insurance products applied for and issued on or after 1 January 2018 will be no more than 80% of the premium in the year of issue. The ongoing commission that Count Financial can receive will not exceed 20% per annum of the premium (33% per annum of the premium for level commission structures).

Referral fees

If you have been referred to your Adviser by a third party they may pay that referrer a fee. The franchisee and/or your Adviser may also receive a benefit for referring you to third parties for specialist services.

If applicable, further details will be disclosed in Part Two of this FSG at 'Referral Arrangements' and in your SoA.

6. Benefits we may receive

Product Provider Payments

We receive payments from product providers on a monthly or quarterly basis each year. For investment products these payments are based on the average balance of funds placed by all Count Advisers in each relevant product provider's investment option(s). We will continue to receive payments where we have an entitlement to do so under an agreement with a product providers prior to 1 July 2013.

For insurance products these payments are based on the value of insurance placed by all Count Advisers either on the relevant product providers platform or in insurance products offered by the provider. The payments received are based on a number of factors including the date that the policy was issued (only policies issued before 31 December 2017 are eligible to be included) and the level of policy lapses/cancellation.

Incentive payments

Fee rebate or waiver

The franchisee and/or your Adviser may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees are for the provision of support services provided by Count to the franchisee and include such items as annual membership fees, software and data service fees, Paraplanning fees and the travel and accommodation costs associated for attending conferences and training events.

Other benefits we may receive

Alternative remuneration

From time to time, Count and your Adviser may also receive other benefits from product providers. If other benefits are received, they can only be valued at less than \$300 per provider each year or will otherwise be declined.

Count and your Adviser maintain a public register of all other benefits we receive, regardless of whether they are accepted or declined. We also maintain a conflicts of interest register.

Conflicts of interests are circumstances where some or all your interests are inconsistent with, or diverge from, some or all of our interests or those of your Adviser. If you would like to see a copy of these registers, you can speak with your Adviser or contact us.

A Licensee Advice Fee is charged by the Licensee, Count Financial Limited, on some products. It is a payment for services related to the provision of advice. These include (among others):

- Access to and research of product and platform offerings;
- Technical and strategy advice;
- Technology and process support; and
- Professional and technical development.

Professional Development Conference Sponsorship

We may also receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help us to offset the organisational and running costs of providing education and training services for our Advisers.

Safeguards Adopted

We have adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These include

- providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- referring you to another adviser within our Group to provide advice to you, and
- declining or withdrawing the services provided to you.

We believe these safeguards are a sound and effective means for controlling and avoiding conflicts of interest. Where we have identified a conflict of interest, we will act as a reasonable advice provider without a conflict would do, including providing advice that is in the client's best interests.

7. Complaints, privacy and compensation arrangements

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

What to do if you have a complaint

Count is committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice for whatever reason, you should take the following steps:

Step 1: Contact your Adviser

If you have a complaint or are not satisfied with the advice or services provided to you, you should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

Step 2: Complaints Manager

If your complaint has not been resolved to your satisfaction, you can contact the CBA Group Customer Relations team.

CBA Group Customer Relations is the Commonwealth Bank Group's primary escalation point for client feedback with a particular responsibility for resolving complaints. You can contact them by:

Writing:	CBA Group Customer Relations Reply Paid 41 Sydney NSW 2001
Emailing:	customerrelations@cba.com.au
Phone:	1800 805 605

Step 3: Financial Ombudsman Service (FOS)

If a satisfactory outcome is still not reached, you have the right to make a complaint, free of charge, to the Financial Ombudsman Service (FOS). You can contact the FOS by:

Writing:	Financial Ombudsman Service Limited GPO Box 3 Melbourne VIC 3001
Emailing:	info@fos.org.au
Phone:	1300 780 808
Fax:	(03) 9613 6399

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

If your concerns involve unethical conduct, you may wish to consider raising these concerns with the Financial Planning Association of Australia (FPA). They can be contacted at PO Box 109 Collins St Melbourne VIC 8007.

Our compensation arrangements

We have professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

Our professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on our behalf.

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