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FINANCIAL SERVICES GUIDE

Issue Date Monday, 24 June 2019

This Financial Services Guide (FSG) is dated 24th June, 2019 and replaces all previous versions. Capri Financial Services Pty Ltd (CAR No. 1237797) (CFS, we, us) is a Corporate Authorised Representative of Grange Financial Services Pty Ltd AFSL 488609 (Grange). Grange and CFS authorises the distribution of this FSG.

About This Guide

This Financial Services Guide (FSG) is an important document that is designed to tell you about:

- Who we are.
- How you can contact us.
- The financial services we offer so you can make an informed decision whether to use those services.
- Information we need from you.
- The cost of our advisory services and how we pay our representatives.
- Any (potential) conflicts of interest we may have.
- What to do if you have a complaint about our services.

If you need further information on any of these matters, please ask.

About Us

Capri Financial Services ABN. 56 604 798 316 is a dynamic financial planning firm specialising in portfolio management, superannuation, insurance, capital raisings and investments. With a team of experienced planning and investment specialists, we can assist clients in tailoring specific strategies to achieve their financial and lifestyle goals.

At Capri, we believe in old fashioned values teamed with new fashioned investment ideas and decisions. Built on trust, honesty, confidentiality and a passionate desire to see our clients become secure in their financial decisions both now and well into the future. We have over half a century of combined financial industry knowledge and experience and we strive to form long term financial relationships with our trusted clients, specialising in building wealth, protecting wealth, and providing retirement planning strategies.

We understand that each client is unique in their financial needs and goals. So we endeavour to closely work alongside each client to help build an appropriate strategy tailored specifically to achieve the lifestyle and investment goals required.

Grange Financial Services Pty Ltd holds Australian Financial Services Licence (AFSL) 488609 authorises Capri Financial Services and is authorised to provide financial services under this licence.

Grange Financial Services provides authorisation for Capri Financial Services Pty Ltd to provide financial product advice and deal in financial product by applying, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following class of financial products to retail and wholesale clients:

- Deposit & Payment Products
- Derivatives (options, warrants and CFDs)
- Foreign Exchange Contracts
- Government Debentures, Stock or Bonds
- Life Insurance Products, including investment & risk
- Managed Investment Schemes (including Investor Directed Portfolio Services)
- Managed Discretionary Accounts
- Securities (shares)
- Superannuation

To Obtain Services from Us

If you do not have a nominated adviser, you can contact us at:

Office Address

Capri on Via Roma
Level One, 15-21 Via Roma
Isle of Capri Qld 4217

Postal Address

PO Box 443
Isle of Capri Qld 4217

Ph: 07 5527 6040

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If you request a service that requires us to give you personal financial advice, we will provide you with a nominated financial adviser. By personal financial advice, we mean that advice that will take into account your personal objectives, financial situation and needs.

CFS has authorised advisers to provide these financial services to you and the details of your nominated adviser can be found in the Adviser Profile given with this FSG where appropriate. The Adviser Profile will outline the adviser contact details together with the training, education, experience and authorisations for that adviser.

As the Licensee, Grange is responsible for the advice you receive from us. If your adviser is unable or unwilling to provide you with personal advice or services in respect of certain products or considered to be in your best interest the adviser will refer you to another representative of CFS or explain why they are unable to provide that advice.

General Financial Advice

At times CFS may only offer you general financial product advice, including where Authorised Representatives are only authorised to give General Financial Product Advice. You should note that general financial advice does not relate specifically to you and therefore may not be appropriate to your particular financial needs, objectives, financial circumstances and best interests. You need to take this into account before deciding whether or not to act on this advice.

Personal Financial Advice

CFS recommends that you should always seek the advice of a qualified Financial Adviser. If our Financial Advisers provide you with personal financial advice your initial discussions should be treated as a Fact Find and you may be required to complete a questionnaire that includes personal information. (Please see our Privacy Policy which can be found on our website, www.caprifs.com.au) This is important as every situation is unique to the individual and the advice you receive should be tailored to your specific needs and at all times be in your best interest.

This information will allow your planner to prepare a Statement of Advice (“SoA”) which you will receive at the time or as soon as is practical after the advice is given. This statement will set out the advice, the

basis on which the advice was given and any remuneration or other benefit that we, including your financial adviser and associates, may receive. We will also include details of any matter that might reasonably be expected to be capable of influencing us in providing this advice or be considered a Conflict of Interest.

If you maintain a personal advice relationship with us, then generally we will not provide a SoA for further advice situations unless there have been significant changes to either your personal circumstances or the basis of the advice since your last SoA was provided. In these circumstances however, we are still required to keep a Record of Advice ("RoA"). You have the right to request a copy of the RoA at any time.

From time to time you may receive a Product Disclosure Statement (PDS). A Product Disclosure Statement (PDS) is a document, or sometimes a group of documents, that contains information about a financial product including any significant benefits and risks, the cost of the financial product and the fees and charges that the financial product issuer may receive. We recommend that before you invest in any product you read the relative PDS and please ask any questions for anything you are not sure of.

You will receive an annual statement disclosing any ongoing fees that you have paid along with the services provided to you, this is called our Fee Disclosure Statement (FDS). This is an ideal time to discuss the fees you are paying with your adviser, of course this can be done at any time.

You will also receive a renewal notice every 2 years seeking your consent to continue to provide the financial product service to you (this is the Opt-in requirement) where ongoing fees are involved.

Buying and Selling Shares

Acting as your agent, we will buy and sell securities on Australian Securities Exchange ("ASX") or any other appropriate global exchange for you. Once your securities have been bought or sold, you will receive a contract note or confirmation from us or the executing broker setting out the details and costs of the transaction. We will not accept orders for 'short sales' on ASX.

A short sale is where the seller does not presently hold or have the immediate right to hold title to the security.

CFS is not a participant of the ASX and will always engage an executing broker to effect transactions. Executing brokers are clearing participants or engage a clearing participant to settle trades on ASX. CFS has a relationship with CMC Markets, Desktop Brokers and Interactive Brokers for the execution and settlement of domestic and international equity transactions.

CFS, its financial advisers, the executing broker and the clearing participant have the right to refuse to accept orders from any person at any time and do not have to provide a reason for this refusal.

You may specify how you would like to give us instructions to trade e.g. by telephone, email or other means.

Where we provide you with execution related telephone advice, you may request a written record of that advice.

You should be aware that CFS may record telephone conversations.

If you are buying shares or any other financial product we require you to provide the funds in advance. Please note that in accordance with industry practice and regulation, we cannot accept cash.

- **Penalties**

Fees will be charged on accounts that do not settle in accordance with industry practice. If you owe us money, we reserve the right to charge interest on any amounts outstanding. Default in payment may result in sale of the securities, including any other securities held in a client's account, to recover costs and may incur fees from executing and clearing providers.

Managed Discretionary Accounts

A "Managed Discretionary Account", or MDA, is an arrangement whereby you authorise CFS to operate your account and conduct trading activities on your behalf without prior reference to you.

CFS offers an MDA service for securities and superannuation.

You must enter into a formal "MDA Agreement" before CFS can provide MDA services and your adviser will complete a full fact find in order to determine if an MDA account is suitable and in your best interest.

CFS and your adviser will provide a relevant investment program as part of the MDA Agreement and will only transact on your behalf in line with the recommended investment strategy. The investment program will detail the nature and scope of the discretion and any limitations that may apply.

The MDA Agreement will contain information about the following:

- Any significant risks associated with the MDA service.
- Warnings that the Investment Program may not be suitable for the client if the client has provided us with limited or inaccurate information, and that the Investment Program may cease to be suitable if the client's relevant personal circumstances change.

CFS will review the suitability of the Investment Program for you once every 12 months, however a change in your personal circumstances may mean an earlier review is required. We ask that you notify us of any changes in your personal circumstances.

Under the CFS managed portfolio service we will provide quarterly statements, confirming trading or investments made, transaction costs, management fees and performance. There is an additional fee for this service.

There are significant risks associated with entering into an MDA Agreement. In general, the risks of an MDA correspond to the risks of the underlying investments, being securities and Superannuation.

There are additional risks associated with the MDA, you will not control the day-to-day investment decisions in relation to the account and will be bound by CFS trading decisions.

CFS may undertake a large number of trades on your behalf which incur transaction costs. While it is the intention of CFS to make profits every time we trade in the markets, CFS's judgment on a particular trade may be incorrect and result in a loss.

Managed Discretionary Account service arrangements are only suitable for clients who have a firm understanding of financial markets and the risks associated with trading in these markets.

If you wish to instruct CFS in relation to the financial assets held in your managed discretionary account portfolio, you must do so by the methods set out in this FSG.

In the case of securities (share) trading and/or investments under an MDA, you will hold custody of portfolio assets as part of your CHESS holdings. The name and contact details of the execution and clearing broker (which may change from time to time) will be specified in the MDA Agreement application. The name and contact details of the execution and clearing broker (which may change from time to time) will be specified in the MDA Agreement application.

CFS will not provide custodial or depository services in relation to your portfolio assets under the securities (share) trading/investments under the MDA.

This FSG complies with the requirements of ASIC Regulatory Guide 179.

Product Disclosure Statements

When advice is given, we will also give you, where appropriate, a Product Disclosure Statement issued by the product provider containing information you would reasonably require to make a decision about whether to acquire the financial product. The PDS will disclose details of any fees and charges payable for that product and include significant risks and benefits.

Privacy

CFS values its client confidentiality and for details of our Privacy Policy and how this relates to you information please visit our website www.caprifs.com.au

AML/CTF

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 passports and drivers licence. We will also retain copies of this information. We assure you that this information will be held as per our Privacy Policy.

What Do You Pay For Our Services?

CFS is remunerated through the fees and commissions that we charge you. To assist you in making an informed decision we will discuss with you and agree on any fees payable before providing a service. The Corporations Act requires us to fully disclose all fees and charges, so if you are in doubt please ask us to explain.

Remuneration based on commissions or volume will not be accepted except where specifically permitted by law and/or where informed consent is first provided by you.

You may be charged a fee for the services we provide or we may be paid a commission or brokerage or a combination of the two may apply. All fees and commissions are payable to the Licensee and include the fees we pay for clearing and settlement where appropriate.

The level will vary with the financial product being traded, the frequency of your trading activity, the type and level of service and the size of the transaction. Fees and commissions are subject to negotiation prior to us providing you with a financial service. As part of our negotiations, all share trades would normally be subject to a minimum dollar cost which would apply if the brokerage calculated by any other method fell below the minimum figure. Once disclosed and agreed, these fees and commissions will be charged at the time your transaction is executed or the service is provided.

The fees listed below relate to all of our products. Please refer to the Product Disclosure Statement and associated literature for specific fees that will relate to a particular product.

The following lists our base commission rates for advisory based services in Securities (Shares) and, Derivatives. These rates are inclusive of GST and are subject to change from time to time.

- Domestic and International Shares - \$85.00 or 1.0% (whichever is greater) plus GST. For example, if you traded shares to the value of \$40,000, our brokerage would be \$400. If you traded shares to the value of \$5,000, our brokerage would be the \$85.00.
- Australian Options \$85.00 or 1.0% (whichever is greater)

Statement of Advice

- Where advice is sought a letter of engagement will be issued outlining the services requested and the costs associated with this advice. The scope and scale of advice will determine the ultimate fees to be adopted and if any ongoing fees are also to be charged. Once this letter of engagement has been signed we will set about formalising the Statement of Advice document.

Portfolio Management and Mailbox Service

- Fees for this service are based on an assets held under management. Fees charged will be up to a maximum of 1.5%pa plus GST on total of assets held, with fees deducted on a monthly basis.

Financial Advisers

Financial Advisers of CFS are remunerated through a combination of fees and commissions that you are charged. To assist you in making an informed decision your Advisor will discuss with you and agree on any fees payable before providing a service. The Corporations Act requires us to fully disclose all fees and charges, so if you are in doubt please ask us to explain. You will receive an annual Fee Disclosure Statement that will confirm the ongoing fees and related services that you are paying for.

You may be charged a fee for the services we provide or we may be paid a commission or brokerage or a combination of the two may apply. All fees and commissions are payable to the Licensee and include the fees we pay for financial product providers.

Alternately you and your adviser may choose to enter into a flat fee-based arrangement whereby you will pay a per annum service fee, based on the value of assets that are managed on your behalf. This fee will be negotiated by you and your Adviser and will be agreed in writing within the Letter Of Engagement (LoE) at the time when your account is opened. The fee is calculated on a per annum basis and may be charged monthly or quarterly in arrears.

The level of fee charged will vary with the financial product, the frequency of your trading or investment activity, the type and level of service and the size of the transaction. Fees and commissions are subject to negotiation prior to us providing you with a financial service. As part of our negotiations, all share trading will be subject to a minimum dollar cost which would apply if the brokerage calculated by any other method fell below the minimum figure. Once disclosed and agreed, these fees and commissions will be charged at the time your transaction is executed or the service is provided.

We may receive commissions from Life Insurers when acting on your behalf. These commissions are calculated as a percentage of the amount paid as a premium. Additionally, we may receive trailing commissions from Life Insurers.

From 1st January 2019 these commissions are capped at 77% (including GST) for initial commissions and 22% (including GST) for renewal fees. From 1st January 2020 the initial commission cap will reduce to 66% (including GST)

If you require assistance in processing a claim for Income Protection, TPD or Trauma, we reserve the right to charge you up to 2.2% (including GST) of the insurance claim.

Other Benefits We May Receive

CFS, its advisers and authorised representatives may from time to time receive non-cash benefits with a cash value less than \$300. Details of benefits in excess of \$300 will be maintained on a register. These benefits will normally be one off and will not be received from a product provider on a regular basis.

You have a right to request further information in relation to the remuneration, the range of amounts or rates of remuneration, and soft dollar benefits received by the licensee and/or representative.

Grange Securities Pty Ltd may host a formal annual training event. This event is attended by advisers of the Financial Services Licence and is funded by a variety of product providers on our APL. These funds are at no point directly received by advisers or CFS and do not in any way influence the recommendations made within this Statement of Advice.

Do any Relationships Exist Which Might Influence The Service or Advice I Receive?

CFS is not owned by any Fund Manager or institution – we are 100% privately owned.

Our advisers are aware of their obligations to disclose the extent and nature of any relationship that may be a conflict of interest or involve a related party. Details will be provided in the Statement of Advice at the time the advisers provide a financial service in those products.

From time to time CFS its Advisers and related parties may hold the same investments as clients.

Dispute Resolution

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms. If you have any complaint about the service provided to you, you should take the following steps –

- Contact your adviser and tell your adviser about your complaint. The majority of complaints can be resolved this way.
- If you do not have an adviser, or your complaint is not acknowledged within 7 days, please contact the Client Services Manager at Capri Financial Services on 07 5527 6040 or email info@caprifs.com.au
- You can also put your complaint in writing and send it to us at:

Capri Financial Services Pty Ltd
Attention: Client Services Manager
PO Box 443
Isle of Capri Qld 4217

We will try and resolve your complaint quickly and fairly. You should receive written acknowledgement of your complaint within 5 business days after we have received your complaint in writing.

If we cannot reach a satisfactory resolution, you can raise your concerns with the Australian Financial Complaints Authority on 1800 931 678 (free call). Grange Financial Services Pty Ltd is a member of this complaints resolution service (Member Number 39916). The Australian Securities & Investments Commission (ASIC) also has a free call Info line on 1300 300 630 which you may use to make a complaint or obtain information about your rights.

Professional Indemnity Insurance

Grange confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). In particular our Professional Indemnity insurance, subject to its terms and conditions, provides professional indemnity for GFS and our authorised representatives / financial advisers / employees in respect of our authorisations and obligations under our Australian Financial Services Licence. The insurance will continue to provide such coverage for any authorised representative / financial adviser / employee who may have ceased, for work done whilst engaged with us.

Feedback

Capri Financial Services welcomes your feedback, if you have a comment about the service you have received or have any questions regarding this FSG please let us know via info@caprifs.com.au .