GODFREYPEMBROKE

Financial Advice Specialists

Financial Services Guide | Version 13

Preparation Date: 20 May 2019

Important Information

This Financial Services Guide, which includes the Representative Profile presented with it, is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole Financial Services Guide (FSG), as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the **'Contact us'** section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the **'Contact us'** section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.

About Godfrey Pembroke

Financial freedom is about enablement.

The financial advice specialists at Godfrey Pembroke are self-employed business owners, so they understand the challenges of managing complexity. They can help you manage yours by establishing a strategic plan, guided by specialist area expertise. They will set in place the structures and disciplines to plan through and collaborate with you to build your life, to your design.

Our associations and relationships

At Godfrey Pembroke we pride ourselves on providing a comprehensive range of financial advice services. Our network of self-employed advisers bring specialist expertise, and they understand intimately how to manage complexity. The Godfrey Pembroke history is underpinned by unparalleled customer service and personal attention to our clients' needs.

Godfrey Pembroke is part of the National Australia Bank Limited ('NAB') group of companies ('NAB Group'). As the NAB Group is an issuer of financial products, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice).

Godfrey Pembroke financial advisers are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited).

These include products and services with the following branding:

- NAB, National
- MLC
- JANA
- JB Were
- Plum
- Pre Select Funds
- Private Investment Consulting
- WealthHub Securities
- Altrinsic Global Advisers
- Antares Capital
- Fairview Equity Partners
- Intermede Investment Partners
- Presima Inc
- Redpoint Investment Management

If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on Godfrey Pembroke's approved product list. These will include NAB Group products. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests. You can view a copy of our approved product list on the Godfrey Pembroke website (godfreypembroke.com.au).

NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by Godfrey Pembroke or its authorised representatives.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

MLC Limited will pay National Wealth Management Services Limited, a related body corporate of NAB, a distribution allowance as described in the 'Distribution Allowance' section of this FSG. If appropriate to your requirements, objectives and circumstances then a Godfrey Pembroke adviser may recommend an insurance policy issued by MLC Limited.

Payments and benefits we receive

At Godfrey Pembroke, you can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- as a fee for advice that will be deducted from your investment as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a financial product provider when you commence an insurance contract or loan product; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment method at any time.

Other payments we may receive

We will provide you with details of all fees, commissions, or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples. Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

Godfrey Pembroke and your financial advice specialist keep a register detailing certain non-monetary benefits received eg benefits valued between $100 and $300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist. Please be aware that Godfrey Pembroke may charge you for the cost of providing this information to you.

Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

Distribution allowance

MLC Limited pays a distribution allowance to National Wealth Management Services Limited, a related body corporate of NAB, in respect of the distribution of MLC Limited's insurance products by licensees in the NAB Group (including NAB). This amount is not ascertainable at this time and will depend in part on the value of MLC Limited's insurance portfolio relating to insurance distributed through NAB and its related bodies corporate and the performance of NAB and its related bodies corporate against agreed annual performance criteria.

This allowance is not shared with us, and does not represent an additional charge to you.

Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

Our complaints procedure

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

   Phone:
   1800 611 950 (free call)
   Email:
   advice.complaints@nab.com.au

   In writing to:
   Advice Dispute Resolution Team
   Godfrey Pembroke Limited
   Level 2, 105–153 Miller Street
   North Sydney NSW 2060

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

   Website: www.afca.org.au
   Email: info@afca.org.au
   Telephone: 1800 931 678 (free call)

   In writing to:
   Australian Financial Complaints Authority
   GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint, but are no longer representatives of Godfrey Pembroke.

Privacy Notification

How we manage your personal information

To give you appropriate advice, our financial advice specialists will need to ask you about your current financial situation, what you are looking to achieve and other personal information.

Without this information, your financial advice specialist may not be able to provide you with advice relevant to your circumstances.

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification covers us and tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.

If you would like more information about our Licensee Godfrey Pembroke (and other members of the NAB Group), please also refer to the Godfrey Pembroke Privacy Policy available at **godfreypembroke.com.au/nav_footer/privacy**.

Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us; or
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information.

This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including Godfrey Pembroke and other members of the NAB Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Godfrey Pembroke and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities) where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB and companies in the NAB Group may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid; or
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products).

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

Consent to marketing activity

We presume you consent to being contacted by us (including Godfrey Pembroke and other members of the NAB Group) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the '**Contact us**' section of this FSG). We will process your request as soon as practicable.

Gaining access to your personal information

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

Correcting your information

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

FURTHER INFORMATION

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at **oaic.gov.au**

GODFREYPEMBROKE

Financial Advice Specialists

Godfrey Pembroke Limited

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GODFREYPEMBROKE

Much more than money

Representative Profile

This document forms part of the Financial Services Guide Version 13 preparation date 20 May 2019 and is designed to clarify who we are, what we do, and aims to help you decide whether to use our services.

Representative Profile

Who we are

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke Limited.

Trevor Bransdon
Authorised Representative No. 322847

Craig Milroy
Authorised Representative No. 241930

Katherine O'Sullivan
Authorised Representative No. 1240933

Bianca Norman
Authorised Representative No. 1235112

Arran Curll
Authorised Representative No. 241981

David Rule
Authorised Representative No. 424540

Nourah Zezulka
Authorised Representative No. 1264047

The Financial Services that the above financial advice specialists offer are provided by Much Pty Ltd, ABN 78 097 176 264 trading as Much more than money Authorised Representative (AR) No. 242058.

Trevor Bransdon is a Certified Financial Planner (CFP ®) and has been associated with Godfrey Pembroke since 2006. Prior to entering the financial services industry, Trevor was a teacher of senior mathematics as well as a small business owner. Trevor also holds an Honours degree in Exercise and Sport Science. He is a member of the Financial Planning Association of Australia.

Arran Curll has a Bachelor of Commerce and a Graduate Diploma in Financial Planning. He is an associate member of the Financial Planning Association. Arran joined the team in 1998. He is a current board member of Lifeline Canberra.

Craig Milroy has a Bachelor of Financial Administration from the University of New England and was admitted as an associate member of the Institute of Chartered Accountants in 1995. He is also a Certified Financial Planner (CFP ®) and member of the Financial Planning Association. Craig joined the Godfrey Pembroke group in 2000 and joined our office in 2012 and is the current Chair of the Much Pty Ltd Board.

David Rule joined Godfrey Pembroke in 2008. He is a Certified Financial Planner (CFP ®) and member of the Financial Planning Association. David has a Bachelor of Applied Economics and Business Administration from the University of Canberra.

Katherine O'Sullivan joined Godfrey Pembroke in 2015. She has a Bachelor of Business in Financial Planning and is a member of the Financial Planning Association of Australia. She recently completed her education requirements to become a Certified Financial Planner and is on her way to becoming a CFP Professional.

Nourah Zezulka joined Godfrey Pembroke in 2014. She has a Bachelor of Economics and a Bachelor of Commerce. She recently completed her education requirements to become a Certified Financial Planner and is on her way to becoming a CFP Professional.

Bianca Norman joined Godfrey Pembroke in 2015 and joined Much in 2018. Bianca has a Graduate Diploma of Financial Planning, is a Certified Financial Planner (CFP®) and is a member of CPA Australia.

Godfrey Pembroke has authorised your advisers to provide you with this Financial Services Guide.

Representative Profile

What we do

We are authorised by Godfrey Pembroke Limited to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Derivatives
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

Contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Postal Address: 39 Torrens Street, Braddon ACT 2612
Canberra Office: 39 Torrens Street, Braddon ACT 2612
Sydney Office: Level 6, 122 Arthur St, North Sydney NSW 2060
Phone: (02) 6249 1555
Fax: (02) 6247 5744
Email: team@muchmorethanmoney.com.au
Website: muchmorethanmoney.com.au

Representative Profile

How we charge for our services

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Initial consultation	At our expense
Advice preparation	Fees will be stated at the Initial Consultation and will be based on the complexity of your situation and level of contact. Fees may be paid directly by you via credit card, direct debit, cheque or collected through the product issuer. If you elect one of our ongoing advice packages for the ongoing review of your financial planning strategy, the ongoing service fee is based on the complexity of ongoing advice. The amount paid will range from $3,300 to $40,000 and will be based on: • the complexity of your situation • the amount you invest • an hourly rate agreed with you • an agreed flat dollar fee • a combination of the above The ongoing advice fee will be collected periodically as agreed with your Adviser through the product issuer or paid directly by you via credit card, direct debit or cheque.
Ongoing fee for advice	If you elect one of our ongoing advice packages for the ongoing review of your financial planning strategy, the ongoing service fee is based on the complexity of ongoing advice. The amount paid will range from $3,300 to $40,000 and will be based on: • the complexity of your situation • the amount you invest • an hourly rate agreed with you • an agreed flat dollar fee • a combination of the above The ongoing advice fee will be collected periodically as agreed with your Adviser through the product issuer or paid directly by you via credit card, direct debit or cheque.
Ad hoc advice	In limited circumstances, we may provide ad-hoc, transactional advice to clients that are not participating in an ongoing service fee arrangement. An hourly fee of up to $440 will apply.
Stamping fees	Where we receive stamping fees from issuer companies for raising capital or debt on behalf of that company, we will offset this payment against the cost of our advice to you.

Representative Profile

How we charge for our services (cont)

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Pre-existing arrangements

For clients already in a pre-1 July 2013 commission arrangement, we may receive commission on investment products or margin lending products held. For investment products, the relevant produc issuer will pay initial commission between 0% and 5.5% and ongoing commission between 0% and 0.88% of the value of your investments for as long as you hold the product. For margin loans the relevant product issuer will pay an ongoing commission between 0% and 0.88% of the outstanding loan balance. Commissions are paid to us by the product provider and are not an additional cost to you.

Insurance products

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commissio to us. The commission is calculated as a percentage of the premium paid (and may include healt occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are se out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for $1000 on 1 December 2019. We may receive an initial commission of up to $700 ($1000 x 77%) in the first year and ongoing commissions of $330 per annum ($1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of $500, we may receive an initial commission up to $330 ($500 x 66%). The ongoing commissions on the additional cover may be up to $165 ($50 x 33%). This is in addition to the ongoing commissions of $330 per annum when the policy wa purchased. Total ongoing commissions payable to us may be up to $495 ($1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by th product provider and are not an additional cost to you. These commissions may be used to offset advice preparation and ongoing fees, as agreed with you.

Representative Profile

Referrals

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to an associated entity or related third party

We may refer you to the following associated entities or related third parties and therefore may receive a direct or indirect benefit from any referral we make to this provider.

Details on the associated entity are set out in the table below and specific details of any benefits we may receive from the referral will be provided in our advice documents to you. Alternatively, you can request further details about our associated entity and related third party arrangements prior to us providing you with financial advice.

We are obligated to act in your best interests when providing you with financial advice, as such we will be transparent and disclose any benefits we may receive via an associated entity or related third party in relation to our recommendations to you.

Table – Other Business Activities, Associated Entities and Related Third Parties:

Name of Entity	Nature of association
Much Finance Pty Ltd trading as Much more than finance	Much Finance Pty Ltd is a wholly owned subsidiary of Much Pty Ltd. All directors and owners of Much Pty Ltd have an indirect interest in Much Finance Pty Ltd through their holding in Much Pty Ltd. As a result, they are likely to benefit from any income derived by Much Finance Pty Ltd.

Please note that Godfrey Pembroke Limited is not responsible for the advice and services provided by these providers.