

Financial Services and Credit Guide

Capital Wealth Group Pty Ltd

Capital Wealth Group Pty Ltd,(ABN 35 134 282 527, ACN 134 282 527) as trustees for The Palermo Family Trust (ABN 63 675 290 466) trading as Capital Wealth Group Pty Ltd is an Authorised Representative Authorised Representative number 333156) and (Credit Representative number 368633) of Hillcross Financial Services Limited ("the Licensee").

References to "our", "we", "us", "me" and "I" refer to Capital Wealth Group Pty Ltd as Trustee for the Palermo Family Trust

This Financial Services and Credit Guide ("Guide") contains information that will help you decide whether to use the financial services we offer. It sets out:

- who we are and how to contact us
- the advice and services we provide
- information about the Licensee
- our fees and how we are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us

Not Independent

Generally, we provide personal advice in line with the Licensee's Approved Product and Services List (APSL) which may include financial products and services associated with the Licensee. We may receive commissions from life insurance products we recommend and non-monetary benefits such as training and educational seminars from product providers. For these reasons, we are not considered independent, impartial, or unbiased.

Our contact details:

Address: Suite 7, 14 Albert Street, Blackburn VICTORIA 3130

Phone:03 9894 2722

Email: david@capitalwealth.com.au

Website: <https://www.capitalwealth.com.au>

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Documents you may receive in the financial planning process

We will provide you with several documents as you progress through your financial planning and advice journey. We may provide these documents electronically to your nominated email address, unless otherwise agreed.

When we provide personal advice, it will normally be documented and provided to you in a Statement of Advice (SoA). The SoA contains a summary of your goals and the strategies and any financial products we may recommend to achieve your goals. It also provides you with detailed information about product costs and the fees and other benefits we and others will receive, as a result of our advice.

If we provide further personal advice an SoA may not be required. We will keep a record of any personal advice we provide you for seven years. You may request a copy of such records by contacting us during that period.

If we recommend or arrange a financial product for you, we will provide a Product Disclosure Statement (PDS), or Investor Directed Portfolio Services (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks, as well as the costs you will pay the product provider to manage that product. You should read any warnings in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

Our advice and services

We are authorised to provide personal or general financial advice on:

- Wealth Accumulation
- Personal insurance
- Superannuation strategies and retirement planning
- Retirement income streams, including pensions and annuities
- Budget and cash flow management
- Centrelink and other government benefits

We are authorised to provide advice on and arrange the following products:

- Superannuation
- Securities
- Retirement savings accounts
- Managed investment schemes including Investor Directed Portfolio Services (IDPS)
- Deposit and payment products, including basic deposit, non-basic deposit, and non-cash payment products
- Life Products – Investment life insurance
- Life Products – Life risk insurance (including life cover, income protection cover, total and permanent disability cover, and trauma cover)

Your adviser may also be authorised to advise on other specialist areas. These are listed in their adviser profiles.

Transaction services

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice.

Instructing us

You can give us instructions by telephone, mail, email, or other methods, as agreed with your adviser.

Providing information to us

It is important that we understand your circumstances and goals, so that we can provide you with appropriate advice and services. You have the right not to provide us with any personal information. Should you choose to withhold information, or if information you provide is incomplete or inaccurate, the advice or services we provide you may not be appropriate for you.

It is also important that you keep us up to date by informing us of any changes to your circumstances so we can determine if our advice is still appropriate.

Credit services

In addition to financial services, we are also authorised to We may be provided access to free services such as credit reports and valuations from our lenders. Details of any relevant services we may receive because of a recommendation we make to you, will be included in the Credit Proposal we provide to you.

Credit documents you may receive

When we provide credit assistance, we will conduct a preliminary assessment to determine the suitability of a particular product. This is normally documented and provided to you in a Credit Proposal. We will retain this document and you may request it by contacting our office within seven years of the assessment. We will only provide recommendations to apply for a particular credit contract with a certain lender or increase the credit limit of a particular credit contract where the contract meets your needs and objectives and is not unsuitable to your circumstances.

Lenders and lessors

The Licensee has a broad panel of lenders and lessors for your Accredited Mortgage Consultant (AMC) to choose from. The full list of approved lenders is available on request but is not an exhaustive list of lenders who offer credit of the nature you may seek.

As at September 2022, the lenders whose products are most commonly recommended by AMCs authorised by the Licensee are Westpac, Macquarie Bank, ANZ, NAB, St George Bank, Bank SA.

Benefits we may receive from lenders and lessors

Subject to compliance with relevant laws, including relating to conflicted remuneration, lenders may offer incentives that are paid directly to the AMC. These may include indirect benefits, for example business lunches, tickets to sporting or cultural events, corporate promotional merchandise and other minor benefits.

Credit reports and valuations

We may be provided access to free services such as credit reports and valuations from our lenders. Details of any relevant services we may receive because of a recommendation we make to you, will be included in the Credit Proposal we provide to you.

Tiered Servicing Arrangements

Through your AMC's relationships with lenders, they may have access to tiered servicing arrangements. The benefits can include faster processing, better information or greater levels of assistance provided for obtaining loan approval. You will be advised of any tiered service arrangements that are in place with a particular lender

that they have proposed at the time recommendations are made.

Access to these programs is not based solely on the volume of new or existing lending your AMC's customers have with each respective lender and does not entitle them to any additional commissions outside of what they have disclosed to you, any additional payments or preferential customer discounts.

Privacy Collection Statement

We are committed to protecting your privacy and outline below how we maintain the privacy of the information we collect about you.

As part of the advice journey, we need to collect information about you. Where possible we will obtain that information directly from you, but if authorised by you we may also obtain it from other sources such as your employer or accountant. If that information is incomplete or inaccurate, this could affect our ability to analyse your needs, objectives and financial situation, so our recommendations may not be appropriate or suitable for you.

We are also required to implement client identification processes under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006. We will need you to present identification documents such as passports and driver's licenses to meet our obligations.

We keep your personal information confidential and only use it in accordance with the AMP Group (the Group) Privacy Policy. Some of the ways we may use this information are set out below:

- We and the Licensee may use this information to provide financial and/or credit advice and services to you;
- We may disclose your information to other financial advisers, brokers and those who are authorised by the Licensee to review clients' needs and circumstances from time to time, including other companies within the Group;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist us and the Group to provide financial and/or credit advice and services to you. A list of countries where these service providers are located can be found in the Group Privacy Policy; Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (you can opt-out at any time); and
- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (you can opt-out at any time); and
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

We and the Licensee will continue to take reasonable steps to protect your information from misuse, loss, unauthorised access, modification or improper disclosure. You can request access to the information we or the

Licensee holds about you at any time to correct or update it as set out in the Group Privacy Policy. The Group Privacy Policy also contains information about how to make a privacy complaint. For a copy of the Group Privacy Policy visit <http://www.amp.com.au/privacy> or you can contact us.

Confidence in the quality of our advice

If at any time you are not satisfied with our services, the following will help you understand your options and find a resolution.

- Contact your adviser and tell them about your complaint.
- Alternatively, you can contact the Licensee at:
 - Phone 1800 812 388
 - Email advicecomplaints@amp.com.au
 - Online at www.amp.com.au
 - In writing to:

Attention: Advice Complaints Department

Hillross Financial Services Limited
Level 25, 50 Bridge Street
Sydney NSW 2000 Australia

They will try to resolve your complaint quickly and fairly. They will provide you with a decision about your complaint within 30 days of us receiving it.

We note that in some circumstances, it may not be possible for us to completely resolve a complaint within this timeframe. If you do not agree with our decision in respect of your complaint, or are otherwise unsatisfied with our response, you may escalate your complaint to one of the following External Dispute Resolution Schemes.

Any issues about financial advice, investments, superannuation, insurance matters, or credit matters	Australian Financial Complaints Authority (AFCA) GPO Box 3, Melbourne VIC 3001 1800 931 678 www.afca.org.au info@afca.org.au
Any issue about your personal information	The Office of the Australian Information Commissioner GPO Box 5218, Sydney NSW 2001 1300 363 992 www.oaic.gov.au enquiries@oaic.gov.au

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

Professional indemnity insurance

We maintain professional indemnity insurance to cover our advice and the recommendations provided by your adviser. The Licensee is also covered by professional indemnity insurance and this satisfies the requirements imposed by the Corporations Act 2001 and National Consumer Credit Protection Act. The insurance also covers claims arising from the actions of former employees or representatives of the Licensee, even where subsequent to these actions, they have ceased to be employed by or act for the Licensee.

About the Licensee

Hillross Financial Services Limited ABN 77 003 323 055
Australian Financial Services and Australian Credit Licensee; Licence No: 232705

Registered office is at 50 Bridge Street, Sydney NSW 2000 Australia.

The Licensee has:

- Approved the distribution of this Guide
- Authorised us to provide advice and other services as described in this Guide.

About the AMP Group

The Licensee is a member of the AMP group of companies. We can provide advice on products and services from a wide range of financial product and service providers, some of which are related or associated with the Licensee, namely:

- National Mutual Funds Management Limited
- AMP Capital Investors Limited
- NMMT Limited
- SuperIQ Pty Limited
- N.M. Superannuation Pty Limited
- ipac asset management Limited
- AMP Bank Limited
- SMSF Administration Solutions Pty Limited

If we recommend a product issued by the AMP Group or a third party product issuer, they will benefit from our recommendation by receiving product, administration and investment fees, as well as fees paid by fund managers to distribute their product. These fees are all disclosed in the relevant PDS or IDPS guide.

The Licensee maintains an APSL, from a diversified selection of approved Australian and International fund providers, including companies related to the Licensee. These have been researched by external research houses as well as our in-house research team. The Licensee regularly reviews products and services to ensure they remain competitive with similar products that address

similar client needs and objectives. Generally, we recommend products on the APSL. However, if appropriate for your needs, we may, subject to the Licensee's approval, recommend other products.

Authorised Representatives and/or staff employed in our business may hold shares in AMP Limited, whose share price may be favourably affected by the sale of products issued by AMP Group companies.

Our fees

We will discuss and agree the actual fees with you before we proceed and where relevant the fees and commissions will be disclosed in the advice document provided to you. The following section outlines the types of fees that may apply.

The fees charged for our advice and services may be based on a combination of a set dollar amount, or a percentage-based fee. Our agreed advice and service fees may include charges for one off or regular fees. We may also receive initial or ongoing commissions from certain product providers.

Licensee fees

All permissible fees and commissions will be paid directly to the Licensee. It will then pass on the amounts due to us through its payment system. The Licensee charges us a Licensee Fee each year. The Licensee Fee is determined as an annual amount based on a number of factors, including our business revenue, the number of advisers and/or accredited mortgage consultants in the practice and a practice fee.

Other costs

Other costs may apply in the process of providing our advice and services to you. We will agree all additional costs with you prior to incurring them.

The following table outlines the range of fee we charge and should be used as a guide only. We will discuss your individual needs and agree our fees with you. The actual agreed fees will depend on factors such as the complexity of your circumstances and goals and the scope of the advice. All fees and charges include GST.

Fee type & Description

Initial or ad hoc fees

Statement of advice fee ranging from \$2,200 to \$5,500.
Principal & Senior Financial Planner \$330.00 per hour (incl.gst) or fixed amount as agreed, or normal brokerage rates where ad hoc services are provided.

Annual advice and service fees

We provide a review service to help you stay on track to meet your goals. Our review service fees vary depending on the scope and complexity of services provided.
You can elect to enter into a 12-month advice and services agreement as part of your financial planning strategy. The fee can range from a \$3,300 pa to \$20,000 pa depending on the level and complexity of service. Details of the services and fees will be set out within the agreement.

Commissions

Insurance:

Initial commissions: Up to 66% of the first year's premium for new policies implemented from 1 January 2020.

We may receive commissions on increases or additions to existing policies of up to 66 %.

Ongoing commissions:

Up to 33% of the insurance premium each following year.

For example: On insurance policies implemented from 1 January 2020, if your insurance premium was \$1,000, we would receive an initial commission of up to \$660. We would receive an ongoing commission of up to \$330 pa.

Other benefits we may receive

In addition to the payments explained above we may receive other monetary and non-monetary benefits, support services or recognition from the Licensee to help us grow our business. These are not additional costs to you. They could include training, badging rights, technology and technology support, marketing, financing, events or other recognition we are eligible for. We may receive benefits from product issuers that may include non-monetary benefits that are valued at less than \$300. We may also participate in business lunches or receive corporate promotional merchandise tickets to sporting or cultural events and other similar items.

From time to time, AMP Services Limited (ASL) may facilitate access to the Licensee and us to be trained and educated by product issuers on their products.

Hillross Business buy-out option

Prior to 1 January 2022, we entered into an agreement with the licensee to buy the register rights of our client base. If we leave the financial services industry, the Licensee makes available a facility to buy the register rights of our clients (based on a market valuation) and transfer clients to an alternative servicing advice business.

Personal and professional development

The Licensee provides personal and professional development opportunities such as education and professional development programs, offered annually to qualifying practices.

Placement fees

From time to time the Licensee may receive fees from brokers or product issuers (including AMP group companies) for arranging client participation in Initial Public Offerings (IPOs) of financial products. The fee, which is generally a percentage of the fee paid to the broker, varies from offer to offer and by the level of participation by the Licensee. We may share in this fee based on the level of participation by our clients.

Other business interests and relationships

Our Referral arrangements

We may receive payments to refer you to other service providers. These amounts do not involve additional costs and will be disclosed in your SoA. Our current referral arrangements are detailed below:

Provider	Services	Payment arrangement
AMP Bank	Home and business lending services.	Up to 0.85% initial commission and up to 0.25% ongoing commission. For example, for a loan of \$100,000, we would receive up to \$850.00 initial commission and up to \$250.00 ongoing commission.

Other Business arrangements and interests

Aggregated CAR arrangements

David Palermo of both CARs owns equity interests in KBH FP Pty Ltd, which is also authorised by the Licensee to provide financial advice. When the licensee fee is determined for the practices in our aggregation, it will be done based on the total revenue and total number of advisers of all the practices in the aggregation.

Financial and Credit Adviser Profiles

About David Palermo

David Palermo is an Authorised Representative (298348) and credit representative (368736) of the Licensee.

Contact details

Address	Suite 7, Albert Street Blackburn VICTORIA 3130
Phone	03 9894 2722
Email	david@capitalwealth.com.au

Advice and services I can provide

I am authorised to provide the services listed in the Our advice and services section of this Guide.

In addition to the areas listed in that section, I can also advise on:

- Self-managed super funds
- Aged Care

How am I paid?

I receive the following from our firm:

- equity in the firm
- share of revenue

Based on the above, the following contains my remuneration details:

David is the sole director of Capital Wealth Group Pty Ltd as trustee of the Palermo Family Trust trading as Capital Wealth Group Pty Ltd

My other business activities and relationships

In addition to providing the services listed in this guide, I am the sole director of KBH FP Pty Ltd.

As a result, I will benefit from fees, dividends or income received from the business's profits that may result from any payments or other benefits received in respect of the services provided to you.