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**FINANCIAL  
SERVICES AND  
CREDIT GUIDE**

**CAPITAL WEALTH GROUP  
PTY LTD AS TRUSTEE FOR THE  
PALERMO FAMILY TRUST**

Version: 14.0

Date prepared: Monday, 4 July 2022

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

- who we are and how we can be contacted
- the advice and services we provide
- information about our licensee, Hillross Financial Services Limited (Hillross)
- our fees and how we, and Hillross are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us or Hillross

## Documents you may receive

We will provide you with a number of documents as you progress through our financial planning process to capture each stage of your advice journey. We may provide these documents to you 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), known as a financial plan. The financial plan 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 the advice we have provided.

If we provide further personal advice a financial plan may not be required. We will keep a record of any further personal advice we provide you for at least seven years after our relationship ends. You may request a copy of such records by contacting our office 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 service (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 contained in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

### **Not Independent**

Generally, we provide personal advice in line with our 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.

# About our firm

## Summary of the business

Name	Capital Wealth Group Pty Ltd as Trustee for the Palermo Family Trust
Australian Business Number	63 675 290 466
Australian Company Number	134 282 527
Authorised representative number	333156
Credit representative number	333156

## Our office contact details

Address	Suite 7, 14 Albert Street BLACKBURN VIC 3130
Phone	03 9809 5457
Email	david@capitalwealth.com.au

This guide provides information about our advisers including their contact details, qualifications, experience, the services they may offer and financial products they can provide advice on.

Capital Wealth Group Pty Ltd as Trustee for the Palermo Family Trust has more than one office. This FSCG details information about our firm only. You can obtain the FSCG for other offices by contacting them on the details below.

### Blackburn office contact details

Address	Suite 7, 14 Albert Street Blackburn Victoria 3130
Phone	03 9894 2722
Email	info@capitalwealth.com.au

### Mount Waverley office contact details

Address	Suite 9, 318-322 Stephenson's Road, Mount Waverley, Victoria 3149
Phone	03 9809 5457
Email	info@capitalwealth.com.au

## Our advice and services

The below table sets out the types of financial products we are authorised to provide advice on and deal in. We can provide you with personal and general advice on the financial products listed in the table below. We also may be able to arrange for these financial products to be distributed to you without advice from us. In some cases, we may not be able to distribute a financial product to you under non-personal advice if your circumstances do not fit within a product's target market.

In addition to the areas listed in the below table, we may also be authorised to advise in other specialist areas. These are listed in our adviser profiles. At all times we will ensure the appropriate adviser is available to you to provide advice consistent with your goals.

Any additional advice or services we can offer you, will be outlined in **Our financial advisers and credit advisers** on page 12.

We are authorised to provide financial advice in relation to:	We are authorised to provide financial advice and deal in the following products:
<ul style="list-style-type: none"><li>— Wealth Accumulation</li><li>— Personal insurance</li><li>— Superannuation strategies and retirement planning</li><li>— Retirement income streams, including pensions and annuities</li><li>— Budget and cash flow management</li><li>— Centrelink and other government benefits</li></ul>	<ul style="list-style-type: none"><li>— Superannuation</li><li>— Retirement savings accounts</li><li>— Managed investment schemes including Investor Directed Portfolio Services (IDPS)</li><li>— Deposit and payment products, including basic deposit, non-basic deposit, and non-cash payment products</li><li>— Life Products – Investment life insurance</li><li>— Life Products – Life risk insurance (including life cover, income protection cover, total and permanent disability cover, and trauma cover)</li></ul>

Hillross maintains an approved products and services list from a diversified selection of approved Australian and International providers, including companies related to Hillross. These have been researched by external research houses as well as our in-house research team.

Hillross periodically reviews these products to ensure that they remain competitive with similar products that address similar client needs and objectives. Generally, we recommend products that are on the approved products and services list. However, if appropriate for your needs, we may, subject to Hillross' approval, recommend other products.

A copy of the approved products and services list can be supplied to you upon request.

If we recommend a new platform or portfolio administration service, we use those approved by Hillross. These services may include those issued by companies related to Hillross.

As at April 2022, the lenders whose products are most commonly recommended by accredited mortgage consultants authorised by Hillross are Westpac, Macquarie Bank, AFG Home Loans, ANZ, NAB and St George Bank.

### Transaction services

We can arrange financial product transactions for you on your instruction without providing personal advice. If you wish to proceed without our advice, we will ask you to confirm your instructions, which will be documented in writing. We will keep a record of this documentation for seven years after the end of our relationship. You may request a copy of such records by contacting our office during that period.

## Your relationship with us and using our services

You can contact us directly with any instructions relating to your financial products. This includes giving us instructions by telephone, mail or email. We can only accept your instructions via email once you have signed an authority form.

We will work with you to agree what advice and services we will provide and when and how often we will provide them.

Where you agree to annual advice and services, the details will be documented and provided to you in an advice or service agreement. This includes the frequency of contact between us, service standards that may apply, any fee arrangements and how the agreement can be terminated.

If at any time you wish to terminate your relationship with us, please contact us using the details shown in this guide.

## 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 are able to determine if our advice continues to be appropriate.

## Our fees

The actual fee charged to you will depend on the nature of the advice or service we provide. We will discuss and agree the actual fees with you before we proceed. 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:

- Initial advice
- Annual advice and services

Please note that for services in relation to insurance and some credit products, commissions may be paid by the product provider as follows:

- Initial commission - a percentage of the value of your loan balance or insurance premiums; and
- Ongoing commission - a percentage of the value of your outstanding loan amount or premiums, usually calculated at the end of each month in which you hold the loan, or on renewal of insurance products

### Payment methods

We offer you the following payment options for payment of our advice and service fees:

- BPAY, direct debit (savings), credit card or cheque; and
- Deduction from your investment (subject to the advice and service provided)

All permissible fees and commissions will be paid directly to Hillross as the licensee. It will then pass on the amounts due to us through its payment system. Hillross charges our practice 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.

For more information on our services, please see our **Schedule of fees** attached or available on request.

### Other costs

Where other costs are incurred in the process of providing our advice and services to you, you will be liable for these costs. However, we will agree all additional costs with you prior to incurring them.

### Other benefits we may receive

The following are monetary and non-monetary benefits we may receive other than those explained above. These are not additional costs to you.

In addition to the payments we may receive for our advice and services, we may receive other support services or recognition from the licensee to help us grow our business. This could include education or training support, badging rights, technology, 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.

### Development, management and advice (DMA) run off payments

Eligibility to receive DMA run off payments is dependent on me continuing to be authorised by and meeting standards set by Hillross. From 31 January 2020 I will be eligible to receive run-off payments based on the amount of advice revenue I generated in 2018. Advice revenue includes revenue directly attributable to advice provided to a client for an agreed fee. It excludes commissions from

investment, insurance and banking products. These payments are to assist with my cashflow over 3 years until January 2023. Run-off payments will not be made after January 2023. In 2022, the total amount of DMA received will be \$4,950.

### **Placement fees**

From time to time Hillross will 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 Hillross. We may share in this fee based on the level of participation by our clients.

### **Business buy-back option**

Where we request Hillross to buy-back our business on or prior to 31 December 2021 and this is approved by Hillross, then if we leave the financial services industry, Hillross makes available a facility for its authorised representatives to transfer their clients. If this happens, Hillross may buy back the servicing rights of our clients. The facility is subject to certain conditions (such as, reason for sale, time the firm has been operating with Hillross, level of adherence to Hillross compliance requirements and achieving a satisfactory level of customer service), and provides a minimum value for our register of clients. The minimum value is based on a multiple of firm revenue. If at some future time we should look to sell our firm, Hillross may purchase the servicing rights of our clients in these circumstances.

### **Personal and professional development**

Hillross offers education, personal and professional development opportunities to our firms on an annual basis. Participation in these opportunities may be based on attainment of qualifying criteria or open eligibility.

#### **Education and professional development**

Provided we meet specific qualification criteria Hillross will support the firm with up to 20% of the licensee fees payable by the firm to the licensee in 2017 to meet the training and education requirements for financial advisers as required by Financial Adviser Standards and Ethics Authority.

The support mentioned above is paid by Hillross directly to the education provider and not to us.

## Relationships and associations

It is important that you are aware of the relationships that Hillross has with providers of financial services and products as they could be seen to influence the advice you receive.

### About our licensee

Hillross Financial Services Limited

ABN 77 003 323 055

Australian Financial Services and Australian Credit Licensee

Licence No: 232705

Hillross has:

- Approved the distribution of this guide
- Authorised us to provide advice and other services as described in this guide
- Authorised us to provide credit assistance services to you

Hillross' registered office is located at Quay Quarter Tower, 50 Bridge Street, Sydney NSW 2000 Australia.

### About the AMP Group

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

- |                                            |                                                       |
|--------------------------------------------|-------------------------------------------------------|
| — National Mutual Funds Management Limited | — AMP Capital Funds Management Limited                |
| — NMMT Limited                             | — AMP Capital Investors Limited                       |
| — N.M. Superannuation Pty Limited          | — AMP Superannuation Limited                          |
| — ipac asset management limited            | — Australian Securities Administration Limited (ASAL) |
| — AMP Bank Limited                         | — SuperConcepts Pty Ltd                               |
| — SMSF Administration Solutions Pty Ltd    |                                                       |

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.

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.

### Hillross' relationships with other companies

From time to time, AMP Services Limited (ASL) may facilitate access to Hillross and its authorised representatives for issuers to train or educate Hillross and its authorised representatives on their products.

### 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 statement of advice. Our current referral arrangements are detailed below:

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

## Our other business activities and relationships

### Other business interests

#### Aggregated CAR arrangements

Capital Wealth Group Pty Ltd as Trustee for the Palermo Family Trust owns a percentage of the equity interests in KBH FP Pty Ltd. KBH FP Pty Ltd is also authorised by Hillcross to provide financial advice. Our revenue results may be aggregated with KBH FP Pty Ltd's revenue results for the purpose of determining licensee fees and/or the recognition payments (as outlined under Other benefits) that we and KBH FP Pty Ltd may receive.

These benefits include a percentage of the equity interests in KBH FP Pty Ltd .

These benefits include purpose of determining licensee fees and/ or the recognition payments (as outlined under Other benefits) that we and KBH FP Pty Ltd may receive. These benefits include reduced licensee fees

Capital Wealth Group Pty Ltd as Trustee for the Palermo Family Trust and MJO Financial Pty LTD ATF for MJO Family Trust are authorised by Hillcross to provide financial advice. Our revenue results may be aggregated for the purpose of determining licensee fees and/or the recognition payments (as outlined under Other benefits).

## Confidence in the quality of our advice

If at any time you feel like 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 Hillross at:

Phone 1800 812 388

Email [advicecomplaints@amp.com.au](mailto:advicecomplaints@amp.com.au)

In Writing:

**Hillross Financial Services Limited**

**Attention: Head of Advice Complaints and Client Remediation**

Quay Quarter Tower

50 Bridge Street

Sydney NSW 2000 Australia

Online at [www.amp.com.au](http://www.amp.com.au)

More information on Hillross Financial Services complaints handling process can be found in their Complaint Handling Guide, available on <https://www.amp.com.au/support/complaints/complaints-process>.

They will try to resolve your complaint quickly and fairly. They will provide you with a decision in respect to 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 listed in the following table.

<b>Any issues relating to financial advice, investments, superannuation, insurance matters, or credit matters</b>	<b>Australian Financial Complaints Authority (AFCA)</b> GPO Box 3 Melbourne VIC 3001 1800 931 678 <a href="http://www.afca.org.au">www.afca.org.au</a> <a href="mailto:info@afca.org.au">info@afca.org.au</a>
<b>Any issue relating to your personal information</b>	<b>The Privacy Commissioner</b> GPO Box 5218 Sydney NSW 2001 1300 363 992 <a href="mailto:privacy@privacy.gov.au">privacy@privacy.gov.au</a>

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. Hillross 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 covers claims arising from the actions of former employees or representatives of Hillross, even where subsequent to these actions they have ceased to be employed by or act for Hillross.

# Your privacy

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

## Privacy collection statement

As part of the financial planning process, 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 fully or properly analyse your needs, objectives and financial situation, so our recommendations may not be completely appropriate or suitable for you.

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

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

- Your adviser and Hillross may have access to this information when providing financial advice or services to you;
- Your adviser may, in the future, disclose information to other financial advisers, brokers and those who are authorised by Hillross to review customers' needs and circumstances from time to time, including other companies within the AMP group (the Group);
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist your adviser and the Group in providing financial 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 (subject to your ability to opt-out as set out in the Group Privacy Policy);
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

Your adviser and Hillross 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 your adviser or Hillross 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 complaint about a breach of the Australian Privacy Principles.

For a copy of the Group's Privacy Policy visit <http://www.amp.com.au/privacy> or you can contact us.

# Our financial advisers and credit advisers

## About David Palermo



<b>Experience</b>	After a few years as a Graduate Accountant following university, David entered the Financial Services industry working for a large Corporate Super fund. In 2004 he joined a private Financial Planning business and became a Financial Planner shortly after. David has successfully completed the FASEA Financial Adviser Exam
<b>Phone</b>	03 9809 5457
<b>Email</b>	david@capitalwealth.com.au
<b>Authorised representative number</b>	298348
<b>Credit representative number</b>	368736
<b>Qualifications (Finance related)</b>	
Diploma of Financial Services (Financial Planning)	
Bachelor of Commerce	
<b>Professional memberships</b>	
FPA - Financial Planning Association	
<b>Professional designations</b>	
CFP - Certified Financial Planner (FPA)	

## The advice and services I can provide

I am authorised to provide the services listed in the **Our advice and services** section.

I am also a credit representative of Hillcross and am authorised to provide strategic debt advice regarding how to structure debt, suitability of existing loan structures and repayment options. I am not authorised to provide credit assistance. If you require advice involving mortgages or other lending products, I can refer you to an accredited mortgage consultant.

## How I am 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. Capital Wealth Group Pty Ltd owns shares in KBH FP Pty Ltd. As sole director and beneficiary this means David may receive distributions from the trust, subject to the discretion of the Trustees.

**My other business activities and relationships**

In addition to providing the services listed in this guide, I have a relationship with KBH FP Pty Ltd . Hillross has no involvement in these activities and is not responsible for any services, advice or products provided by this business.

I control a percentage of the equity interests in the business providing the services listed above. 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.

# Schedule of fees

These prices 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.

## Initial fees

These are fees paid when you have agreed to receive our advice:

Initial service	Fee amount
Statement of Advice fee	\$2,200 to \$5,500
Advice and Placement	Principal & Senior Financial Planner \$330.00 per hour (incl.gst) or fixed amount as agreed, or normal brokerage rates

## Annual advice and service fees

We also offer the following services for a fixed period of 12 months.

Service	Fee amount
Review service. 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	From \$3,300 pa to \$20,000 for a twelve month period or otherwise fixed amount as agreed.

The amount of fees will depend on the service offering and these will be provided in a separate advice or services agreement.

## Commissions

We may receive commissions when implementing certain products for you, in line with the below. Any commission amounts will be disclosed to you when providing our advice. The following table is a guide of commissions we may receive.

Product type	Initial commission	Ongoing commission	Example
Insurance (including those held within superannuation)	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%.	Up to 33% of the insurance premium each following year.	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 \$330.00 pa.

All fees and charges include GST.

If an agreed advice fee is charged then we may rebate all or some of the commission.