

FINANCIAL SERVICES GUIDE PART ONE

Infocus Securities Australia
Pty Ltd ABN 47 097 797 049
AFSL No. 236523.
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Maroochydore QLD 4558
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WE ARE REQUIRED BY LAW TO GIVE YOU A FINANCIAL SERVICES GUIDE (FSG), THAT HELPS EDUCATE, PROTECT AND ASSIST YOU TO MAKE AN INFORMED DECISION ABOUT THE FINANCIAL SERVICES WE OFFER.

HOW TO READ THIS FINANCIAL SERVICES GUIDE

Infocus Securities Australia Pty Ltd ABN 47 097 797 049 'Infocus' is providing you with this FSG to assist you in making an informed decision about the financial services and products we offer. Infocus ('we,' 'us' or 'our') provides financial services through its Australian Financial Services Licence (AFSL) No. 236523.

Your financial adviser ('Adviser') is an Authorised Representative of Infocus and provides services on behalf of Infocus. Infocus is responsible for the services and product advice provided to you by your Adviser, in line with their authorisation, as well as the content and distribution of this FSG.

Infocus' Financial Services Guide is comprised of two parts and both parts must be read together.

Part One – Includes general details about:

- Who is Infocus?
- Financial Services and Products we provide
- Advice Process
- Documents you may receive
- Our Associations and Relationships
- Fees and Other Costs
- What you should do if you are not satisfied with our services
- Professional Indemnity Insurance

Part Two – Provides your Adviser's details including:

- Representative's Details and Remuneration
- Fees and other costs you may incur when engaging with an Adviser

FINANCIAL PLANNING PROCESS

About Infocus

Infocus is proudly Australian-owned and together, we have been helping Australians dream, plan and achieve since 1994. Infocus operates our own AFSL and Australian Credit Licence, so we can offer you the scale and sophistication of a large organisation, yet retain our strong family foundations to ensure we remain closely connected to each of our clients.

Financial Services and Products we provide

We can provide advice and transact on your behalf, in relation to the following types of financial products:

- Deposit and payment products;
- Government debentures, stocks or bonds;
- Life products including investment life insurance products, life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;
- Managed Investment Schemes;
- Retirement savings account products;
- Securities;
- Standard margin lending facility; and
- Superannuation products.

Additional specialist advice areas may include aged care, self managed super funds, direct equities, margin lending, gearing and credit assistance. Some of the financial services or products that we are authorised to provide may be beyond those which we authorise your Adviser to offer. Please refer to Part Two for your Adviser's scope of authorisation.

Your Adviser can only recommend products listed on the Infocus Approved Product List. When it is appropriate and depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the Approved Product List. If this happens, this recommendation must meet our selection criteria and approval process.

Advice Process

CONNECT	<ul style="list-style-type: none"> • Meet your Adviser • Introduce our services and how we can help you • Discuss the FSG and Letter of Initial Engagement
COLLECT	<ul style="list-style-type: none"> • With your consent, discuss your goals and objectives and understand why you seek financial advice • Gather information relevant to your situation
ANALYSE	<ul style="list-style-type: none"> • Evaluate the information provided • Consider what strategy will best achieve your goals • Research all possibilities • Construct our recommendations
ADVISE	<ul style="list-style-type: none"> • Present your financial plan • Discuss how our recommendations can help achieve your goals and objectives
IMPLEMENT	<ul style="list-style-type: none"> • Agree to proceed and implement your financial future • Client Service Agreement to secure our ongoing relationship
RECONNECT	<ul style="list-style-type: none"> • Review your goals, objectives and personal circumstances annually • Ensure your financial plan is still appropriate to your situation • Adjust as required

DOCUMENTS YOU MAY RECEIVE

You may receive other documents in addition to this FSG when your Adviser provides you with personal financial advice.

Statement of Advice

Advice provided to you by an Adviser that is personal in nature, in that it considers your individual needs, objectives and financial circumstances, and must be presented to you in a written Statement of Advice (SoA). The SoA includes the advice recommended by the Adviser and the basis on which the advice is given, details of the providing entity and information on any payments or benefits the adviser or licensee will receive. This document will contain enough detail for you to make an informed decision as to whether to act on the advice provided.

Record of Advice

When providing further personal advice, your Adviser may provide you with a Record of Advice (RoA). Most often, a RoA is provided to existing clients to confirm changes to, or implementation of, advice provided in a previous SoA. A RoA is only appropriate if there have been no significant changes to your personal circumstances or the basis of the initial advice. Where your circumstances or the basis of the advice is significantly different, your Adviser will provide you with a SoA.

Product Disclosure Statement

A Product Disclosure Statement (PDS) is a document that your Adviser will provide to you when recommending or offering a financial product. It includes information about the product's key features, fees, commissions, benefits, risks and the complaints handling procedure.

OUR ASSOCIATIONS AND RELATIONSHIPS

Related Parties

The following entities are all wholly-owned subsidiaries of Infocus Wealth Management Ltd ABN 28 103 551 015:

- Infocus Property Advisory Pty Ltd ABN 33 140 154 570, is a specialist property advisory company holding the following Real Estate Licenses NSW 20028743, QLD 3894354, VIC 082027L and Property Investment Professionals Association Licence Number 10513.

- Infocus Lending Advisory Pty Ltd ABN 19 134 237 031 and Australian Credit Licence Number 392704, trading as Infocus Lending Advisory, provides all mortgage and lending services.
- Infocus Tax & Business Advisory Pty Ltd ABN 40 615 064 983, trading as Infocus Tax & Business Advisory, is responsible for the provision of tax, accounting and business advisory services.
- Infocus Financial Planning Pty Ltd ABN 78 129 238 099, trading as Infocus Financial Advisory, is a Corporate Authorised Representative of Infocus Securities Australia Pty Ltd ABN 47 097 797 049 Australian Financial Services Licence and Australian Credit Licence No. 236523, responsible for all financial services provided.
- Alpha Fund Managers Pty Ltd ABN 37 124 085 883 operates as investment manager for the Alpha fund series of investments with Equity Trustees Ltd operating as the responsible entity.
- Alpha Investment Management Pty Ltd ABN 13 122 381 908 Australian Financial Services Licence 307379 is an investment manager for the Alpha Separately Managed Accounts (SMAs).

Each entity and their representatives are liable only for the services provided within their discipline.

Infocus is a corporate member of the Association of Financial Advisers Limited (AFA) and the Tax Practitioners Board (TPB). As a member of these organisations, Infocus is required to adhere to the AFA and TPB's standards.

Our Relationships

Portfoliofocus and Portfoliofocus Administration and Reporting and/or Infocus provide services to product providers or acts as the promoter for a number of providers including Australian Money Market Pty Ltd (Portfoliofocus Money Market), Avanteos Investments Limited (Ultimate Super and Pension Service), HUB24 Custodial Services Ltd (Infocus Investment Hub and Infocus Super Hub), IOOF Pursuit Focus for Infocus, IOOF Pursuit Select for Infocus, Navigator Australia Limited (Portfoliofocus Premium), Portfoliofocus Investment Service, Portfoliofocus Master Trust and Portfoliofocus Direct Share Trust, Praemium Australia Pty Ltd (Infocus Managed Accounts), SuperIQ Pty Ltd (Portfoliofocus SMSF) and Ultimate Investment Service.

Infocus or its associated entities may receive various payments from these financial institutions based on the average balance of all funds placed by Infocus Authorised Representatives in each relevant institution's investment. These payments include rebates, marketing arrangements etc. from a number of preferred administrative platform/s or product providers. Payments can be received as a percentage of business placed/retained, profit share arrangement/s or an agreed dollar amount. Please note

these payments are made by the product provider to Infocus and not charged to you.

The maximum rebate or payment we may receive is up to 0.3% of the portfolio balance and in most cases is lower than this. The amount of the payment we are entitled to receive will be detailed in your advice document.

Details of any payments received including if any payments are shared with our Authorised Representatives will be disclosed in your advice document.

Financial institutions may contribute to the cost of providing training opportunities throughout the year as part of our Alliance Partner Program (APP). This support helps to offset the costs associated with the delivery of training and support to our Authorised Representatives. Our Alliance Partners are as follows:

These payments are received from Aberdeen Standard, AB Managed Volatility, AIA Australia Limited, ANZ Wealth Management, Bennelong Funds Management, BT Platform, BT Financial Group, Centuria, Charter Hall, Clearview, Colonial First State, Colonial First State Global Asset Management, Commlnsure, Fidelity, Generation Life, IOOF, La Trobe Financial Asset Management Limited, MLC Limited, Morningstar, Netwealth, Perennial, Perpetual, Praemium Australia Pty Ltd, Rare Infrastructure, TAL Life Limited and Zurich.

Benefits I should be aware of

From time to time, your Adviser may be entitled to receive benefits, at no additional cost to you, such as:

- Educational conferences and seminars: these are arranged by Infocus and attendance may be fully or partially subsidised by Infocus;
- Non-monetary benefits: these may include business lunches, tickets to sporting and cultural events, promotional goods or other minor benefits from Infocus or product providers.

Any benefits that Infocus or its Representatives may receive will only be accepted to a value of less than \$300 per provider per year. Any benefits received exceeding this limit will not be accepted. Infocus and its Representatives maintain a register for any alternative remuneration received, where such remuneration is material and value greater than \$100. The 'Alternative Forms of Remuneration Register' includes details is maintained by fund managers, IDPS (platform) providers, representatives and licensees. Registers are publicly available and can be provided upon request.

Applicable Client Rebates

Infocus may receive one-off payments where you decide to purchase products or services from Provider direct marketing. We currently have arrangements in place with AIA Vitality, myOwn Health Insurance and TAL Health Insurance. If Infocus receives these payments for services provided or products purchased by you, we will disclose further detail in your advice document.

Fees and Other Costs

Fees and other costs may be paid for the advice you receive and the financial products used, when engaging our services. Your Adviser will describe their fees and what services this includes, upon initial engagement and before providing any financial advice.

All fees and other costs will be disclosed, in a written disclosure or advice document, to you at the time of personal financial advice or when transacting on your behalf. Part Two of this FSG describes what types costs you may incur and the value of these, should you decide to receive personal financial advice from your Adviser. The types of fees that we may charge for the are inclusive of Goods and Services Tax (GST).

What should you do if you are not satisfied with our services?

If you are not happy with your Adviser or the services provided to you, we encourage you to:

- If you feel it is appropriate, discuss the issue with your Adviser in the first instance,
- If you are unable to resolve the issue, please contact Infocus Professional Standards. You can contact them by:
 - Writing to: Professional Standards Manager, PO Box 1856, Sunshine Plaza QLD 4558
 - Emailing: professionalstandards@infocus.com.au; or
 - Calling: 07 5406 5000.

We will aim to resolve your complaint quickly and fairly. If the complaint cannot be resolved to your satisfaction within 45 days, you have the right to refer the matter to an external dispute resolution scheme.

Lodgment of complaints should be directed to Australian Financial Complaints Authority (AFCA), of which Infocus is a member. You can contact them by:

- Writing to: GPO Box 3, Melbourne VIC 3001; or
- Calling: 1800 931 678.

Professional Indemnity Insurance

Infocus maintains Professional Indemnity (PI) Insurance which covers claims in relation to the conduct of Authorised Representatives who are no longer authorised by Infocus, but who were at the time of the relevant conduct.

Infocus' Financial Services Guide is comprised of two parts and both parts must be read together.

The information in this document is considered to be true and correct at the date of publication. Changes to circumstances after the time of publication may impact on the accuracy of the information held.

If you have any further questions about the financial services Infocus provides, please contact your Financial Adviser.

PART TWO REPRESENTATIVE DETAILS

Version 9.0 Date Effective 13/07/2020

Saltwater Financial Group is operated by Sophia McClelland through Saltwater Financial Group Pty Ltd ABN 47 641 451 505, who is a Corporate Authorised Representative (No. 001282387 for financial services) of Infocus.

Office Contact Information

OFFICE ADDRESS	20 Highview Place, Parkwood QLD 4214
POSTAL ADDRESS	PO Box 611, Labrador QLD 4215
PHONE NUMBER	0413 696 898
WEBSITE	saltwaterfinancial.com.au
EMAIL	sophie@saltwaterfinancial.com.au

The following individual is an Authorised Representative of Infocus and provides personal financial advice through Saltwater Financial Group Pty Ltd:

Sophia McClelland ADFP
Senior Financial Adviser
Authorised Representative - No. 000345949

Financial services and product types your Adviser can provide

Sophia is authorised to provide personal financial advice, general financial advice and transact on your behalf (dealing) in relation to the following types of financial products:

- Deposit and Payment Products
- Government Debentures, Stocks or Bonds
- Life Products (Investment Life Insurance and Life Risk Insurance Products)
- Managed Investment Schemes

- Retirement Savings Account Products
- Superannuation (investment and risk)
- Securities

There are some additional specialist advice areas your Adviser is authorised for as indicated below by a tick '✓'.

SPECIALIST AREA	SOPHIA
AGED CARE	✓
DIRECT EQUITIES	✓
MARGIN LENDING & GEARING	✓
SELF MANAGED SUPER FUNDS	✓

In addition, if your adviser identifies that you require specialist advice on a particular product or service outside of their authorisation, they will provide recommendations to seek further advice.

Sophia is registered with the Tax Practitioners Board as a Registered Tax (Financial) Adviser. Based on the information collected from you, the advice considers the tax consequences that relate directly to the financial advice being provided. Your Adviser is not a Registered Tax Agent and consequently will not provide advice on your tax liabilities. As such, we strongly recommend you review this advice with a Registered Tax Agent.

Representative Remuneration

Saltwater Financial Group Pty Ltd receives 95% of the fees and or commission; the licensee, Infocus Securities Australia Pty Ltd (Infocus), receives the balance, being 5%.

Sophia McClelland is remunerated by means of a salary, fees and commission generated. Further, Sophia and her associates may receive other benefits from all fees and commission paid.

HOW WILL I PAY FOR SERVICES PROVIDED?

A breakdown of the types of payments we may receive is set out in the following.

INITIAL ADVICE FEES

Initial advice fees may be invoiced directly or collected from the product. Such fees include:

Initial Consultation - No fee is charged for an initial consultation with your Adviser.

Advice Preparation - This includes the costs associated with the enquiries made to collect and confirm your circumstances and financial position, the research and analysis of suitable strategies to achieve your goals and objectives, investment and product selection and suitability to your needs and goals as well as amalgamating this into your financial plan and presenting it to you. This fee will vary based on the complexity and type of strategy. Your Adviser will discuss this with you prior to commencement, to ensure you can make an informed decision.

This fee may be based on a hourly rate of \$550 per hour with a minimum fee of \$195 and a maximum fee of \$20,000. Alternatively, we may charge a set fee between \$195 to \$20,000 for the preparation of a SoA.

IMPLEMENTATION

The cost of implementing your financial strategy will cost between \$195 and \$20,000, depending on the products, strategies and time involved.

These costs may be in addition to any advice fee and set out in your advice document.

ONGOING SERVICE ADVISER

Additional fees may sometimes be charged when you take up our ongoing services, or invest in retail products through us. Any ongoing service fees that we charge will be detailed in your advice document and client service agreement.

Ongoing fees may be charged based on a fixed dollar amount, the value of the funds invested, or a combination depending on the methodology agreed to in your client service agreement. Ongoing fees will be agreed with you and can range from \$500 to \$20,000.

Alternatively, an Adviser service fee of up to 2.2% of funds under management (e.g. if your investment amount is \$100,000, then Infocus may receive up to \$2,200pa). These fees will typically be paid on an ongoing basis while the investment is still in place.

Where Cash Flow Monitoring strategies are recommended, the following ongoing fees will apply:

- Monthly cash flow monitoring of up to \$4,000 per annum plus a fee of 0.275% (per annum) of funds under management.
- A minimum fee of up to \$1,000 per half year may be charged.

HOURLY RATE DIRECT CHARGES

We may charge for agreed services based on an hourly rate of \$550 per hour or up to a total maximum fee of \$20,000.

Ad-hoc services can be provided on an as needs basis. Fees will be agreed before any work commences.

UPFRONT

This is paid by the issuer of the financial product/s recommended when the product is issued to you. This may be deducted from the initial amount you have invested or it may be payable from the product provider's own resources.

PERSONAL INSURANCES

From 1/01/2020 the maximum amount of commission payable by providers to advisers is restricted to 66% of the premium payable in the first year. Based on a premium of \$1,000pa, this equates to a maximum of \$660 in year one.

ONGOING

This is paid by the issuer of the financial product/s recommended and is payable on an ongoing basis while the investment/insurance is still in place.

GRANDFATHERED ONGOING COMMISSIONS

The Government has legislated the removal of grandfathering of conflicted remuneration payable to Financial Advisers by 31/12/2020.

These Fees will only be charged where arrangements were made prior to 1/07/2013. The ongoing commission we receive may be up to 0.60% per annum of the investment amount. Providers may choose to end the payment of grandfathered commissions prior to this date.

PERSONAL INSURANCES

From 1/01/2020 the maximum amount of commission payable by providers to advisers is restricted to 22% of the premium payable while the hybrid policy is in force (33% per annum of the premium for level policies). Based on a premium of \$1,000pa, this equates to a maximum of \$220 for hybrid policies or \$330 for level policies.

Referral Fees

Where we refer you to other product or service providers and you decide to purchase products or services from them, we may receive a payment as a result of our referral. Where you have been referred to us by someone else we may pay them a fee, commission or some other benefit in relation to that referral. If we pay or receive these payments for services provided or products purchased by you, they do not involve additional costs and we will disclose further detail in your advice document. All relevant referral arrangements will be disclosed in your advice document. Payment and receipt of referral fees is subject to regulatory change under the FASEA Code of Ethics.

Your advice document will disclose any benefits or fees received by Infocus and/or your adviser.

All of the above fees and commissions are inclusive of GST.

This in combination with FSG Part One, concludes the Financial Services Guide.