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## Financial Services Guide: Part One



*This document is Part One of a Financial Services Guide and must be read in conjunction with Part Two.*

This Financial Services Guide (**FSG**) is issued with the authority of NEO Financial Solutions Pty Ltd (**NEOFS**). This FSG is designed to assist you in determining whether to use any of the services offered by NEOFS or its Authorised Representatives. This guide is only complete when you also have Part Two - "Authorised Representative Profile".

### This FSG contains information about:

- NEOFS, who as the Licensee is responsible for the financial service;
- Your financial adviser;
- The financial planning services and products your financial adviser can provide;
- How NEOFS, your financial adviser and other related parties are paid for the financial planning services provided to you;
- Any associations or relationships that could create potential conflicts of interest; and
- Details of who to contact should you have a complaint.

### Who Is NEO Financial Solutions?

**NEOFS** holds an Australian Financial Services Licence No.385845 (**AFSL**) issued by the Australian Securities and Investment Commission (**ASIC**). NEOFS conducts business through a network of financial advisers who are appointed as Authorised Representatives under NEOFS's AFSL. Where NEOFS has appointed a corporate entity as an Authorised Representative, employees of that company who give advice will also be authorised by NEOFS. NEOFS is responsible for the advice and conduct of your NEO financial adviser. We are not responsible for any unauthorised services that they may offer (to the full extent permitted by law), so please check the services your adviser offers in FSG Part Two.

### Authorised Representative Profile – Part Two

Your financial adviser will be the Authorised Representative listed in Part Two of this FSG.

This FSG must be read in conjunction with the Authorised Representative Profile as it forms part of this FSG. It provides detailed information about your financial adviser such as their contact details, referral sources and the types of financial products and services they are authorised to advise/deal in. Please retain both Part One and Part Two of the FSG for your reference and any future dealings with NEOFS and your financial adviser.

### What Other Documents Might You Receive?

You might receive the following documents to help you make an informed decision on any financial strategy or recommended financial product:

#### Statement of Advice (SoA)

All initial personal advice provided to you will be outlined in an SoA. The SoA will contain personal advice, the basis on which it is given, details of fees, commissions and information on relevant associations. The SoA is used for initial advice and where further advice is provided that involves a significant change to your relevant personal circumstances.

#### Record of Advice (RoA)

Where further advice is provided to you in reference to previous advice (SoA) and there have been no significant changes to your relevant personal circumstances, your adviser will provide you with a RoA. There are no limitations in relation to time or how you make your requests for a copy of the RoA.

#### Product Disclosure Statement (PDS)

You will receive a PDS if your adviser has provided advice for you to acquire a financial product. A PDS will contain the key features of the financial product, significant risks and benefits, and fees associated with the financial product.

## What Financial Services and Products Are Available?

NEOFS's AFSL authorises it to advise on and deal in the following classes of financial products to both retail and wholesale clients;

- Deposit & Payment Products
- Government Debentures, Stocks & Bonds
- Life & Disability Insurance
- Superannuation (including Self-Managed Superannuation)
- Managed Investment Schemes
- Retirement Savings Accounts
- Securities
- Margin Lending

NEOFS can assist with the following financial and non-financial services:

- Investment & Wealth Creation
- Pre-Retirement & Retirement Planning
- Wealth preservation
- Social Security / Centrelink
- Estate Planning
- Cash Budgeting & Cash-flow Management
- Debt & Liability Management
- Salary Packaging
- Gearing

## How Can You Give Us Instructions?

You may specify how you would like to give us instructions. You can give us instructions or information verbally or in writing. In some situations, we will require your instructions to be in writing. We will advise you what information we need or what documentation we need you to complete and sign.

## What Information Should You Provide to Receive Personal Advice?

Your adviser must act in your "Best Interests". To assist your adviser in acting in your best interests, as well as helping us to advise you in an appropriate manner and protecting you throughout our relationship, we request you;

- Supply accurate information about your personal circumstances, needs and objectives;
- Update your adviser on any changes to this information;
- Do not make any payments for investments, contracts or fees "made payable" to your adviser;
- Never sign blank forms.
- Never sign any form or agree to any recommendation without fully understanding what you are signing or agreeing to.

You have the right to withhold personal information, but this may have an impact on the appropriateness of the advice you receive. You should read any warnings contained in any advice document (whether SoA or RoA) carefully before making any decision relating to a recommended financial strategy and/or product. Your adviser will request you sign an acknowledgement if you do not wish to provide complete information or if they believe that the information is not accurate.

## How Do You Pay for NEOFS Advice and Services?

### All Fees Are Payable to NEOFS

NEOFS and your financial adviser can be paid fees from you directly, from your superannuation and investment products (for both initial and ongoing advice) or commissions for retail insurance products, or a combination of these payment methods. Your financial adviser will discuss and agree both the rate and method of payment with you before any financial services are provided. Where you receive personal advice, your SoA will detail all remuneration and other benefits associated with the advice.

All fees and commissions disclosed in the SoA are payable to NEOFS. NEOFS may retain up to 30% and forward the balance to your financial adviser. For example, if NEOFS receives \$100, NEOFS will retain up to \$30 and pay a minimum of \$70 to your financial adviser.

## Initial and Ongoing Fees

Fees may be a Fixed Rate Fee, Hourly Rate Fee or a combination of both depending on the complexity of your personal situation and the time and effort in the work done for you. The fees will be discussed and agreed with you prior to services being provided. If advice is provided the fees will be disclosed in your Statement of Advice (SoA). Fees for ongoing advice may be based on a Flat Fee or an Asset Scale Fee. These will be outlined in FSG Part 2.

## Retail Insurance Product Commissions

NEOFS may be paid initial and ongoing commissions by retail insurance product issuers where you acquire any of the retail insurance products via our services. Where the commission in the first year is greater than that payable in later years, the maximum upfront (year 1) commission is 66% and the maximum ongoing (years 2+) commission is 22% (inclusive of GST). For example, for an insurance premium of \$1,000, the commission is up to \$660 upfront and up to \$220 each year thereafter.

Where upfront and ongoing commissions are the same, there is no legislated maximum however product providers generally pay up to 33%. Where the insurance product(s) was purchased prior to 1 January 2018, we may continue to be paid commissions in the same manner as what would have previously been advised to you at the time of obtaining the product(s).

## Referral Fees

If a third party referred you to us, and you consent, we may forward referral payments or commissions to the third party. These amounts do not involve additional costs and will be disclosed in your SoA. All fees and commissions are subject to GST.

## What Information Is Maintained in Your File, Can You Examine the Client File and Who May Access It?

Your financial adviser will maintain a record of your personal information including details of your objectives, financial situation and any recommendations made to you. If you wish to examine your file, please ask your financial adviser and they will arrange for you to do so. In order to provide you financial products or services and undertake the management and administration of those products and services, it may be necessary for us to disclose your personal information to third parties. Your adviser must provide you with a copy of our Privacy Policy. If you require an additional copy please ask or, download a copy from NEOFS's website at [www.neofs.com.au](http://www.neofs.com.au).

## Does NEOFS Have Any Relationships or Associations with Financial Product Issuers?

NEOFS has commercial relationships with several of Australia's leading life risk and wealth management product providers. These companies may engage with NEOFS in partnership arrangements.

Some product providers may also give NEOFS or your financial adviser non-commission benefits such as entertainment or sponsorship up to a maximum value of \$300 per annum. Both NEOFS and your financial adviser maintain a Register to document any alternative forms of payment received. These registers are publicly available and must be provided within 7 days after request.

## Compensation Arrangements

NEOFS has in place Professional Indemnity (PI) Insurance cover in accordance with s. 912B of the Corporations Act 2001. Our PI insurance, subject to terms and conditions, provides indemnity up to our sum insured for NEOFS, our Authorised Representatives and employees in respect to the services provides under our AFS Licence.



### *What Should You Do If You Have a Complaint?*

If you have a complaint about the services provided to you, please take the following steps:

1. Contact your financial adviser and advise him or her of the details surrounding your complaint.
2. If your complaint is not satisfactorily resolved within 3 working days of contacting your financial adviser, please contact the NEOFS Complaints Officer by telephone or in writing to the below listed contact details. NEOFS will try to resolve your complaint quickly and fairly. (08) 9227 1472 or [compliance@neofs.com.au](mailto:compliance@neofs.com.au)
3. If you do not get a satisfactory outcome, you have the right to take your complaint to the Australian Financial Complaints Authority (AFCA), GPO Box 3, Melbourne Vic 3001. Free Telephone call 1800 931 678 or Email [info@afca.org.au](mailto:info@afca.org.au). NEOFS is a member of this Service.

## Financial Services Guide: Part Two



*This document is Part Two of a Financial Services Guide & must be read in conjunction with Part One.*

This Financial Services Guide (FSG) contains important information about:

- Your Authorised Representative/s;
- The Financial Products and Services provided by your Authorised Representative;
- How your Authorised Representative charges for their services; and
- How NEO Financial Solutions Pty Ltd (the Licensee, 'NEOFS 'AFSL 385845) and its Authorised Representatives are paid.



### AUTHORISED REPRESENTATIVE PROFILE

#### CORPORATE AUTHORISED REPRESENTATIVE PROFILE

<b>Authorised Representative Name</b>	Picture Wealth Advisory Pty Ltd
<b>Authorised Representative ASIC Number</b>	1265273
<b>Trading Name</b>	Picture Wealth
<b>Business Address</b>	Level 1, 30 Summers St, East Perth, WA 6004
<b>Postal Address</b>	PO Box 7857, Cloisters Square, WA 6850
<b>Telephone</b>	08 6243 0013
<b>Email</b>	david@picturewealth.com
<b>Website</b>	www.picturewealth.com

*Picture Wealth Advisory Pty Ltd is a Corporate Authorised Representative of NEO Financial Solutions Pty Ltd.*

#### AUTHORISED REPRESENTATIVE PROFILE

<b>Authorised Representative Name</b>	Luke Moorby
<b>Authorised Representative ASIC Number</b>	1254565
<b>Mobile</b>	0422 607 022
<b>Email</b>	luke@picturewealth.com

*Luke Moorby is an Authorised Representative of NEO Financial Solutions Pty Ltd and a Sub Authorised Representative of Picture Wealth Advisory Pty Ltd.*

#### AUTHORISED REPRESENTATIVE BACKGROUND

Luke is a qualified Financial Adviser and is a firm believer that Financial Planning is for anyone who wants to take control of their financial situation.

Luke assists and guides clients to take control of their financial future by aiding them to reach their financial goals as well as ensuring his clients and their families are protected.

Prior to working for Pacific Wealth Solutions Pty Ltd, Luke worked for a boutique financial planning business after completing a graduate financial planning program through AMPFP PTY Ltd.

These experiences have allowed Luke to provide a holistic and structured financial plan with his sound understanding of the market, Life Insurance, Wealth Management, Estate Planning, Retirement Planning and Debt and Cashflow Management.



## FINANCIAL PRODUCTS

### FINANCIAL PRODUCTS AUTHORISATION

The Authorised Representative named in this Financial Services Guide has been authorised by NEOFS to provide advice and deal in the following Financial Products:

✓	Deposit & Payment Products	✓	Life Products – Life Risk Insurance Products
✓	Government Debentures, Stocks & Bonds	✓	Superannuation, RSA's & Retirement Income Stream Products
✓	Life Products – Investment Life Insurance Products	✓	Securities
✓	Managed Investments		

The Authorised Representative named in this Financial Services Guide cannot advice or deal in the following Financial Products:

✗	Standard Margin Lending Facilities	✗	Derivatives
✗	Managed Discretionary Accounts	✗	Self-Managed Superannuation Funds



## HOW WE GET PAID

NEOFS receives all remuneration for services provided by your Authorised Representative. NEOFS then pays Picture Wealth Advisory Pty Ltd 100% of all remuneration received. From this Picture Wealth Advisory Pty Ltd pays Luke Moorby, a salary. In addition, Picture Wealth Advisory Pty Ltd may pay Luke Moorby bonuses.

Following is a guide as to how commissions and/or fees may be charged. If you choose to receive personal advice, the Statement of Advice you receive will detail the specific payments in relation to the products recommended.



## WHAT ARE THE COSTS

### ALL FEES ARE INCLUSIVE OF GST.

Your Authorised Representative may provide you with an initial meeting for which there may be no charge. Further meetings including the preparation, implementation and ongoing advice will be charged by one or a combination of methods as outlined below. You may elect to be invoiced directly for these fees to be paid to NEOFS or you may elect to have these fees deducted from your investments. An estimated cost of services will be provided to you before commencing any work.

Initial Appointment		
We will collect information from you at this meeting and provide you with general advice only at this meeting. The costs in providing comprehensive advice services will be quoted to you at this meeting. To receive comprehensive advice, you will need to have a Statement of advice prepared.	<b>\$0 to \$500 / Hour</b>	
Fee for Service Hourly Rate		
We may charge an hourly rate for the services we provide.	<b>\$330 to \$500 / Hour</b>	
Statement of Advice Preparation Fees		
Advice fees are charged based on the complexity of the advice provided. <i>Please note the SOA preparation fees still apply where you decide not to implement our advice.</i>	<b>\$500</b>	<b>\$15,000</b>
Implementation of Advice (Non-Insurance) (1 <sup>st</sup> Year only)		
<b>Implementation Fee: Flat Fee</b> Investment of superannuation and non-superannuation funds	<b>\$0</b>	<b>\$10,000</b>

Or

<b>Implementation Fee: Asset Scale Fee</b> Based on the combined account balance of superannuation and non-superannuation portfolios (investments), the implementation fee will be calculated as a percentage on the combined balance of the investments. Example: if the combined value of your investments total \$250,000 and you are charged 0.88%, NEOFS would receive \$2,200 per annum.	<b>0%</b>	<b>1.1%</b>
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Life Insurance Commission (1st Year only)	From (Min)	To (Max)
This commission is payable by the insurance company and is a percentage of the insurer's base premium i.e. premium excluding stamp duty, fire services levy, GST, modal loadings or any other government charges, taxes, fees or levies. <i>Example:</i> if the annual premium was \$1,000 NEOFS would receive up to \$660 in the first year based on the maximum.	<b>0%</b>	<b>66%</b>
Ongoing Advice Fee (Non-Insurance)	From (Min)	To (Max)
<b>Ongoing Advice: Flat Fee</b> Ongoing Advice fees will be determined by the complexity and requirements of the recommended strategy.	<b>\$0</b>	<b>\$50,000</b>

Or

<b>Ongoing Advice: Asset Scale Fee</b> Based on the account balance of superannuation and non-superannuation portfolios. The ongoing commission is paid based on the value of your holding in a product for as long as you hold the product. Example: if your account balance is \$250,000 and you are charged 0.88%, NEOFS would receive \$2,200 per annum.	<b>0%</b>	<b>1.1%</b>
Ongoing Life Insurance Commission (Year 2 onwards)	From (Min)	To (Max)
NEOFS may also receive a renewal commission from the insurance company each year while your policy is in force. This is a percentage of the base annual premium you pay. Example: if you're annual premium is \$1,000 NEOFS would receive up to \$330 per annum based on maximum.	<b>0%</b>	<b>33%</b>

**FSG Issued by:** NEO Financial Solutions Pty Ltd  
 ABN 64 141 607 098 | AFS Licence 385845  
 Ground Floor, 30 Summers Street, East Perth WA 6004  
 t: (08) 9227 1472 | e: [compliance@neofs.com.au](mailto:compliance@neofs.com.au)

## Privacy Policy

This policy applies to Australian Financial Services Licensee NEO Financial Solutions Pty Ltd (**NEOFS**), and all our Authorised Representatives. This policy sets out how NEOFS collect and manage personal information we collect from you. The Privacy Act 1988 requires us to handle personal information in accordance with the Australian Privacy Principles.

### Collection of Information – What Is Collected and Why We Collect It?

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. When NEOFS provides you with financial services, we may be required by Corporations Act 2001, Anti-Money Laundering and Counter Terrorism Financing Act 2006 and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to:

- ➔ Your name, date of birth, TFN and contact details.
- ➔ Information regarding dependents and family commitments.
- ➔ Your occupation, employment history, employment circumstances, details family commitments and social security eligibility.
- ➔ Your financial needs and objectives.
- ➔ Your assets and liabilities (current and future), income and expenses.
- ➔ Your superannuation and insurance details.
- ➔ Your investment preferences, attitude or tolerance to investment and financial risk.

### Sensitive Information

NEOFS may need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health, race, genetic, etc.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing with you.

### How We Collect Personal Information?

We collect personal and sensitive information in several ways, including:

- ➔ Directly from you, such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites.
- ➔ Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.

### Are You Obligated to Provide Us Personal Information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us, you risk obtaining products or services that may not be appropriate or suitable for your needs and may risk suffering a financial detriment or loss.

### What Happens If We Obtain Information About You Which We Have Not Solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

### How We Use Your Information

We use your personal information for the primary purpose for which the information was obtained. As an AFS Licensee, that will typically mean for the purpose of:

- ➔ Providing financial services to you.
- ➔ Implementing investment or risk management recommendations on your behalf.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services. If, at any time, you do not wish to receive this information, you may contact us with this request.



## When We Disclose Your Personal Information

We may disclose your personal information to the organisations described below.

- Our Authorised Representatives.
- The product issuers of products and services that you have elected to acquire, vary or dispose of using our assistance.
- Our external service providers.
- Your professional advisers as authorised by you.
- Our regulators.

For example, information may be disclosed to the following parties:

- Product issuers for the purpose of giving effect to the recommendations made by us, and other organisations who support the products and services we offer.
- Other parties involved in the administration of your financial products or insurance cover (e.g. custodians, credit reporting bodies, actuaries, call centres, mail houses, product registries, any persons who propose to guarantee (or have guaranteed) repayment of any credit provided to you, claims assessors etc).
- Other professional advisers, including your solicitor or accountant as authorised by you.
- Our external service providers (e.g. IT providers, professional advisers and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Any person considering acquiring, or acquiring, an interest in our business.

## Government Related Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## Cross-Border Disclosure of Personal Information

We may transfer personal information to related bodies corporate or external service providers in locations outside Australia (including, but not limited to, the United States, Taiwan, Singapore, Finland, Belgium & Ireland) in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

## How We Store and Secure Your Personal Information

We keep your personal information in your client file and our computer database. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, and modification or disclosure.

Hard copy files are accessible to authorised personnel only and are appropriately secured. All computer-based information is protected using access passwords. Data is backed up regularly and stored securely off-site.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a minimum period of 7 years in order to comply with legislative and professional requirements. After this, the information will be destroyed.

## Ensuring Your Personal Information is Correct

We will take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and relevant. If you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

## Access to Your Personal Information

You may request access to the personal information we hold about you by contacting our Privacy Officer at [compliance@neofs.com.au](mailto:compliance@neofs.com.au) with your request stating your advisers name and the information you require. We will respond within a reasonable period after the request is made. Where we provide you access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.



### Dealing with Us Anonymously

You can deal with us anonymously, or using a pseudonym, where it is lawful and practicable to do so. For example, if you telephone NEOFS requesting our postal address.

### Our Website

When you visit our website, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our website and to improve our website.

### Cookies

We use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may negatively impact your experience on our website.

### Third Party Sites

Our website has links to other websites that are not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites, except as required by law. Use of link to third party websites is entirely at your own risk.

### Complaints Resolutions

If you believe that we have breached the Australian Privacy Principles or disagree with a decision that we have made in relation to our Privacy Policy, you may lodge a complaint with us. To enable us to understand and deal with your complaint in a timely fashion, you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us. Please address your complaint to our Privacy Officer. Our contact details are included below.

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, or require further information on privacy, you are entitled to contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)).

### Policy Updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website ([www.neofs.com.au](http://www.neofs.com.au)) or by contacting us.

### CONTACT DETAILS

NEO Financial Solutions Pty Ltd  
**Privacy Officer:** Mark Edman  
Ground Floor, 30 Summers Street, East Perth WA 6004  
t: (08) 9227 1472  
e: [compliance@neofs.com.au](mailto:compliance@neofs.com.au)  
w: [www.neofs.com.au](http://www.neofs.com.au)