



## **Financial Services Guide**

### **Coulson Financial Services Pty Ltd**

Is a Corporate Authorised Representative No. 328223 of

### **Integrity Financial Planners Pty Ltd**

Australian Financial Services Licence No. 225051

Integrity Financial Planners Pty Ltd

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Coulson Financial Services Pty Ltd

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## About Integrity Financial Planners Pty Ltd

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Integrity Financial Planners Pty Ltd (IFP) is a privately owned financial planning business that is a holder of an Australian Financial Services Licence No. 225 051.

IFP has a network of qualified and experienced authorised representatives (advisers) working in established financial planning practices throughout Australia.

We provide financial advice to help you improve your lifestyle by building wealth and/or producing income, depending on your particular needs.

It is important that you have confidence in your financial wellbeing and in your financial arrangements. IFP seeks to give you that confidence, drawing on the expertise of professional advisers.

Your adviser is a representative of IFP, and IFP is responsible for the financial services that they provide you. All IFP representatives have been individually assessed as having the competencies, knowledge, skills, and integrity necessary to deliver quality financial to you.

Head office for Integrity Financial Planners is located at:

Suite 2, 1 Railway Crescent  
PO Box 1140  
CROYDON VICTORIA 3136  
TEL (03) 9723 0522 FAX (03) 9724 9518

### **NOT INDEPENDENT**

***While we will always seek to meet our legal obligations to act in our clients' best interests within the meaning of section 961B of the Corporations Act 2001, we do not fall within the definition of "independent" under section 923A. The reason we do not fall within this definition is because we give our clients the option to allow life insurance companies to pay some of our advisers' commissions for the services that we provide to our clients rather than for us to be required to directly invoice our clients and for our clients to be required to pay us directly. We remain committed to continue to give our clients this important choice.***

## The Purpose of our Financial Services Guide

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The purpose of this Financial Services Guide (FSG) is to explain to you the financial services that IFP can provide, along with a broad general disclosure of any remuneration or benefits that IFP and its representatives would be entitled to receive, as well as any interests, relationships, or associations that IFP and its representatives have that may be capable of influencing the services you receive.

You may receive other disclosure documents from us which may include;

1. Statement of Advice – This document sets out our understanding of your current circumstances, needs and objectives that are relevant to the financial advice you are seeking from us. It also includes specific disclosure of any remuneration or benefits that IFP and its representatives are entitled to receive, as well as any interests, relationships or associations that IFP and its representatives have that may be capable of influencing the services you receive.

2. Record of Advice – Where we have previously provided to you a Statement of Advice, and where we are providing you with further or subsequent advice: and
  - a. your personal circumstances, needs or objectives are not 'significantly different' compared with when we provided you the Statement of Advice; and
  - b. the basis of our advice, is not 'significantly different' to when we provided you with the Statement of Advice;

then we may create a Record of Advice. If the advice recommends a change or replacement of the financial products you currently hold we will provide you with a copy of that advice. If the advice does not recommend a change or replacement of the financial products you currently hold we may simply create a Record of Advice which we will retain on your client file. You may request (in writing or verbally) a copy of that Record of Advice at any time up to 7 years after the date that the advice is provided and we will provide you a copy of that advice without further fees or costs.

3. Product Disclosure Statements - These are documents created by the product issuers (not IFP) and provide details regarding the financial products that have been recommended to you. The details include, but are not limited to, any fees and charges associated with particular products.

### **The various services we can provide you**

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Integrity Financial Planners Pty Ltd and its representatives can help you by providing:

**Financial Product Advice**  
Recommendations and professional opinions about a broad range of financial products

**Implementation**  
Assistance - putting in place financial strategies and acquiring, holding, or disposing of financial products consistent with our advice

**Ongoing Services**  
Ongoing financial services including ongoing advice and implementation services.

IFP is licensed to provide advice and to deal and arrange in relation to the acquisition, holding or disposal of financial products on your behalf in the following areas:

- deposit and payment products such as term deposits and bank accounts
- government debentures, stocks, or bonds
- sharemarket investments and securities
- investments in managed funds and managed investment schemes
- superannuation, retirement income stream (annuities and allocated pension), self-managed superannuation funds and rollover funds
- life insurance products
- margin lending products

### **Who is responsible for the financial services we provide**

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Integrity Financial Planners Pty Ltd (IFP) is responsible for the distribution of this FSG and for the financial services provided by Coulson Financial Services Pty Ltd (Coulson Financial) and any of the advisers authorised by IFP and detailed in this FSG.

## **What kind of financial services is your adviser authorised to provide to you and what kinds of financial products do these services relate to?**

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Coulson Financial, is authorised by IFP to provide financial product advice and to deal and arrange in relation to the acquisition, holding or disposal of financial products in the following classes, subject to the products being on the IFP Approved Product List:

- deposit and payment products such as term deposits and bank accounts
- government debentures, stocks, or bonds.
- share market investments and securities.
- investments in managed funds and managed investment schemes.
- superannuation, retirement income stream (annuities and allocated pension), self-managed superannuation funds and rollover funds.
- life insurance products.

Your adviser can also provide incidental advice related to the tax implications of the recommend strategy and/or product that are the subject of their advice. Your adviser may also provide an ongoing review service. As part of this service, your adviser can conduct a review of your personal situation and the previous advice provided to you and recommend changes if appropriate. Please note that Coulson Financial is not authorised to provide any services on behalf of IFP other than the types or classes financial products listed above, and then typically only to the extent that the products are on the IFP Approved Product List.

## **How can you provide your adviser with instructions?**

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There are various ways in which you can provide instructions to your adviser, including face to face, in writing, by telephone, or other agreed means such as e-mail. We will advise you if any instructions need to be provided in writing.

## **What else can you expect to receive?**

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### ***Personalised advice to suit your needs.***

Our advice is tailored to meet your individual situation. We do not use a “one size fits all” formula for our clients.

We will strive to provide the advice that we believe is in your best interest and most appropriate to assist you in achieving your aims and objectives. And as a smaller group we can adapt our services to meet your requirements.

IFP is privately owned, with no ownership ties to any fund manager or financial institution. We are not required or influenced through ownership ties or associations to recommend or direct you towards any financial products.

To ensure advice is appropriate for your needs, we will ask you for personal information.

Of course, you have the right not to divulge personal information, but you should carefully consider any warnings we give you regarding possible consequences of us not having complete and accurate knowledge of your circumstances, needs and objectives.

### ***Referral arrangements***

Should we identify that you require specialist advice eg accounting, legal, insurance etc we may refer you to a professional known to us. You have complete choice in who you see for this specialist advice and we only make a referral to assist you in complex areas we have identified that go beyond the scope of our expertise. You are under no obligation to seek advice from the person/company we recommend or refer you to. Coulson Financial and IFP do not receive any referral fees or other benefits for referrals made by Coulson Financial.

### ***Clear and documented advice***

Where you request personal advice that addresses your specific circumstances, needs or objectives and it is our initial advice to you, it will be provided in a written Statement of Advice.

IFP takes your financial security seriously. Consequently, IFP requires that all instructions provided by you need to be confirmed by you in writing. IFP will not normally act on telephone instruction unless such circumstances are supported by your written instructions. If you have any queries or uncertainty about this matter, contact us immediately.

### ***About your Adviser***

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Coulson Financial Services Pty Ltd (Coulson Financial) is a Corporate Authorised Representative number 328223 of Integrity Financial Planners Pty Ltd (IFP).

Any advice given to you by Coulson Financial will be provided by a qualified person who is also an authorised representative of Coulson Financial. The following people are currently authorised by Coulson Financial to assist you with financial planning advice:

#### ***Robert Coulson***

Authorised Rep No 249941

Robert is a Manager and Director of Coulson Financial Services.

Robert has over 30 years' experience in the financial service industry. Throughout this time, he has been directly involved in advising clients. He is a Certified Financial Planner (CFP) and a member of the Financial Planning Association (FPA).

Robert is authorised to provide financial services in all the areas that Coulson Financial is authorised in.

No other person is authorised to provide financial services on behalf of Coulson Financial.

## How you pay for the financial services you obtain from us, and how we disclose IFP's remuneration and benefits

IFP may obtain the following remuneration and benefits for the services we provide to you. Please note that all amounts include GST.

	<i>Service provided</i>	<i>Cost</i>
Initial Consultation	There will be no cost for your initial consultation. The initial consultation will include a discussion of your financial circumstances, needs and objectives and a brief discussion about possible solutions. During this discussion, you may consider and agree the nature and scope/scale of the financial services you wish for us to provide to you.	Complimentary
Written Recommendations	If it is agreed that we will prepare a written Strategy Document and/or Statement of Advice, an appropriate fee will apply. Typically, you would expect to pay between \$2,750 and \$11,000 for the analysis of strategies and preparation of this document/Statement of Advice, depending on its complexity. We would agree the scope of the advice and the fee with you prior to us undertaking the work.	From \$2,750 to \$11,000
Implementation of Recommendations	This fee covers the cost of researching and preparing your financial plan and the administrative time spent implementing the recommended strategies and products. Typically, this fee would be from \$0 to \$5,500, however we would advise you of the cost prior to implementing the strategy.	From \$0 to \$5,500
Ongoing Advice and Review	<p>The ongoing advice fee will commence from \$2,200 per annum for our basic level service up to \$11,000 per annum. Our ongoing advice fees ensure your strategy and products are reviewed regularly to ensure you are on track to meet your goals and help you take advantage of opportunities as they become available.</p> <p>If, during our assessment of your ongoing needs, we identify that you require ongoing advice outside of our basic level service, our ongoing advice fee will change. In this case, we will provide you with a quote of what you will be required to pay to receive these services.</p> <p>Before providing you with ongoing advice we will prepare an ongoing advice agreement. The ongoing advice agreement will set out what our ongoing advice will cover, your payment method, and how much it will cost.</p>	From \$2,200 per annum to \$11,000
Life Insurance Commissions	Initial and ongoing commissions are payable by life insurance companies when we recommend life insurance risk products. The commission that is payable to us by the life insurance company is factored into the annual premium and as such does not represent an additional cost to you. Initial commissions are paid by life insurance companies to IFP in the first year and ongoing commissions are paid from year two onwards.	Please refer to the Life Insurance Framework Reforms below.
Additional Services	For additional advice, an hourly fee may be charged. The amount of this fee would be discussed prior to any work being commenced.	\$440 per hour

### **Conflicted remuneration and non-conflicted remuneration**

From 1 July 2013 the new “Future of Financial Advice” legislation (FOFA) came into effect, which prohibits IFP and its representatives from accepting “conflicted remuneration”, subject to certain exceptions. “Conflicted remuneration” is any benefit, monetary or non-monetary that could reasonably be expected to influence the choice of financial product recommended or the financial product advice. This includes commissions, bonuses and rebates, and most volume-based benefits, but there are some exceptions, such as certain levels of remuneration related to life insurance risk products.

### **Life Insurance Framework Reforms**

Under the Life Insurance Framework Reforms (effective 1<sup>st</sup> January 2018), grandfathering arrangements may apply in certain circumstances. This means for all policies that were in place prior to 1<sup>st</sup> January 2018, the rate of ongoing commission that was applicable at the time that the policy was issued, will continue to apply for the life of the policy. The grandfathering arrangement may also apply to policies issued after 1<sup>st</sup> January 2018, where you (as the client) exercise an option to establish new or additional cover under your pre-LIF policy or to fix an administrative error on your pre-LIF policy.

The relevant commissions applicable to your insurance policies will be disclosed to you in your advice document and can range as follows:

<b>Policy Issue Date</b>	<b>Initial Commission (based on annual policy cost less policy fees and stamp duty) Worked example based on \$1,000 initial premium</b>	<b>Ongoing Commission (based on annual policy cost less policy fees and stamp duty) Worked example based on \$1,000 annual premium</b>
From 1 January 2020	0 – 66% or up to \$660	0 – 22% or up to \$220 per annum

*All stated commissions are inclusive of GST.*

### **Who has an interest in these services?**

Product providers or managers may deduct management and administration fees from the products recommended by IFP. Such fees must be disclosed by the product providers in their Product Disclosure Statement.

Fees paid by you for our services and commissions and brokerage paid by product providers or intermediaries, shall be paid to IFP. These amounts shall be paid by IFP to Coulson Financial.

Coulson Financial pays a fee to IFP for the provision of services in its capacity as an Australian Financial Services Licensee.

Coulson Financial is a privately owned company. Robert Coulson is the Director of Coulson Financial. Robert Coulson and or associated persons or entities may participate in the profits earned by Coulson Financial.

Robert Coulson is an employee of Coulson Financial and receives a salary.

IFP also maintain a register of any potential Conflicts of Interest that we may have. A copy of the IFP Conflicts of Interest register can be made available to you, upon your request.

### **Other benefits we may receive**

IFP is one of 18 shareholders and Principal Members of the Alpha Group Pty Ltd (Alpha Group). The Alpha Group receives sponsorship from various product providers and uses this sponsorship to provide Education and Training relevant to the carrying on of a Financial Services business, to Principal Members and their

representatives and employees. IFP discloses sponsors and amounts received from sponsors in an Alternative Remuneration Register. IFP's representatives also maintain Alternative Remuneration Registers and record any benefit they or their employees obtain by way of Education and Training provided by Alpha Group. You may request a copy of the Alternative Remuneration Register of IFP or your adviser by placing such request in writing to your adviser.

IFP and its representatives may receive other benefits from product suppliers. These may include attendance at functions, conferences and training sessions provided by product suppliers. If applicable such benefits shall be disclosed in the Statement of Advice and recorded in IFP's register of Alternative Benefits outlining any such benefits that may be received.

## **Resolving a complaint or concern**

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If you have a concern about services provided by Integrity Financial Planners or any of our representatives we will try and resolve your issues quickly and fairly. To allow us to do so you will need to take the following steps.

1. Contact IFP's Compliance Manager and provide them details of your concerns and complaint. IFP is required to reply to any complaints, concerns, allegations, or queries that you have within 30 days of the receipt of your correspondence.

The Compliance Manager  
Integrity Financial Planners  
PO Box 1140, CROYDON, VIC 3136  
Phone: (03) 9723 0522  
compliance@iplan.com.au

2. If the outcome of your correspondence with the Compliance Manager is not to your satisfaction, you may lodge a complaint in writing with the Australian Financial Complaints Authority (AFCA).

AFCA is a new external dispute resolution (EDR) scheme (operational from 1<sup>st</sup> November 2018) to deal with complaints from consumers in the financial system. It is operated by a not-for-profit company limited by guarantee authorised by the responsible minister. AFCA will undertake an independent review of your concerns.

Australian Financial Complaints Authority  
GPO Box 3, Melbourne Vic 3001  
Phone: 1800 931 678

Further information regarding the Australian Financial Complaints Authority is available from [www.afca.org.au](http://www.afca.org.au)

## **Professional Indemnity Insurance**

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IFP currently holds professional indemnity insurance for activities conducted in accordance with our AFS Licence. The insurance policy terms are generally consistent with section 912B of the *Corporations Act 2001*. Subject to the terms and conditions of the policy, the professional indemnity insurance extends to cover claims made in relation to the conduct of representatives and employees of the Licensee including those who may no longer work for the Licensee (but who did at the time of the relevant conduct).

## **Your Privacy**

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IFP respects your privacy. A copy of our Privacy Statement is available from our website [www.iplan.com.au](http://www.iplan.com.au) or alternatively you can obtain a copy by calling us or asking for a copy from a staff member in our office.