

# Financial Services Guide

**Version 4**  
**Date: 01 July 2022**

# Important Information about our Licensee

## Financial Services Guide

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you
- how we and our associates are paid and any other benefits we may receive
- any potential conflicts of interest we may have
- how we protect your privacy and handle your personal information
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. The Privacy Notification on page 11 is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

## Other documents you may receive

In addition to this FSG, if we provide you with financial advice, we will also present you with a written Statement of Advice (SOA).

This will describe:

- advice and strategies we recommend, and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the "Contact us" section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

## Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the "Contact us" section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.

### Not Independent

Consultum Financial Advisers Pty Ltd (Consultum) is not independent, impartial or unbiased because:

- we are a wholly owned subsidiary of Insignia Financial Ltd (ABN 49 100 103 722) and part of the Insignia Financial Group of companies ("Insignia Financial Group"), which issues a range of products that we may recommend to our clients; and
- we may receive commissions on life insurance products we recommend to our clients.

We are authorised representatives of Consultum Financial Advisers Pty Ltd ABN 65 006 373 995, Australian Financial Services Licence Number 230323 (“**Consultum**”) of Level 1, 800 Bourke Street, Docklands VIC 3008.

## **Our associations and relationships**

Consultum is a subsidiary of the Insignia Financial Group. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC’s Money Smart website ([www.moneysmart.gov.au/investing/financial-advice](http://www.moneysmart.gov.au/investing/financial-advice)).

Consultum Financial Advisers are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial services and products issued, managed or administered by companies within the Insignia Financial Group or companies in which a shareholding is maintained by an Insignia Financial Group member.

These include products and services issued, managed or operated by the following entities:

- MLC Investments Limited ABN 30 022 641 661 AFSL 230705 (branding includes ‘Private Investment Consulting’)
- JANA Investment Advisers Pty Ltd ABN 97 006 717 568 AFSL 230693
- NULIS Nominees (Australia) Limited ABN 80 008 515 633 AFSL 236465 as trustee for the MLC Super Fund ABN 70 732 426 024, and as trustee for the MLC Superannuation Fund ABN 40 022 701 955 (branding includes ‘MLC’ and ‘Plum’)
- Navigator Australia Limited ABN 45 006 302 987 AFSL 236466 (branding includes ‘Pre Select Funds’)
- Australian Executor Trustees Limited ABN 84 007 869 794 AFSL 240023
- IOOF Investment Services Limited ABN 80 007 350 405 AFSL 230703
- IOOF Investment Management Limited ABN 53 006 695 021 AFSL 230524
- IOOF Limited ABN 21 087 649 625 AFSL 230522
- Managed Portfolio Services Limited ABN 77 009 549 697 AFSL 233761
- OnePath Funds Management Limited ABN 21 003 002 800 AFSL 238342
- OnePath Custodians Pty Limited ABN 12 008 508 496 AFSL 238346
- Oasis Fund Management Limited ABN 38 106 045 050 AFSL 274331
- Antares Capital Partners Ltd ABN 85 066 081 114 AFSL 234483 (this includes as the issuer of the ‘Altrinsic Global Equities Trust’ co-branded ‘Altrinsic Global Advisers’ and ‘a partner of MLC Asset Management’)
- Fairview Equity Partners Pty Ltd ABN 45 131 426 938 AFSL 329052
- Intermede Investment Partners Limited
- MLC Asset Management Services Limited
- Presima Inc

If we recommend a product or service issued by an Insignia Financial Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager’s product. Please refer to the relevant PDS and/or offer documents for further information.

## **Approved Product List**

Our Approved Products List (APL) is a list of what we consider to be sound quality, fully researched products, but doesn’t include all possible products available in the market. Only products and services that have been examined by our experienced research team are placed on our APL.

When selecting products for you, we are generally limited to the range of investment products and a selection of 12 insurance providers on the APL. These will include Insignia Financial Group products.

Your adviser will first source from the APL before providing any recommendations. They will only recommend a product or service after considering its appropriateness in relation to your individual objectives, financial situation, needs and best interests. Where your strategy requires products and services other than those on the APL to act in your best interests, our research team will be consulted and we will seek to find an alternative solution.

Consultum and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402 and OnePath Life Limited ABN 33 009 657 176. MLC Limited is part of the Nippon Life Insurance Group. OnePath Life is part of the Zurich Insurance Group. MLC Limited and OnePath Life are not part of the Insignia Financial Group.

# About us

## Who we are

The Financial Services we offer are provided by Silway Pty Ltd, ABN 22 601 730 607 trading as Silway Private Wealth Authorised Representative No. 471226.

The following financial advisers are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of Consultum:

### Todd Burnell

**Authorised Representative Number: 469417**

Todd Burnell is the Director and Senior Financial Planner with Silway Private Wealth and owns part of the practice and therefore benefits from its profits.



Todd began his career in the banking and finance sector in 1992. His experience in the financial services industry has seen him work in both client facing and Senior Management roles with a major Australian Bank and State Government Superannuation Fund.

Todd's focus has always been to help clients achieve their financial and lifestyle objectives whilst ensuring all core issues have been addressed, at the same time supporting them in navigating the changes happening around them.

Todd is passionate about the provision of financial advice and during his career has assisted many clients to achieve their financial objectives. Some areas in which Todd specialises include:

- Successful retirement planning
- Life transitions (such as career retrenchment)
- Unique insight into financial challenges and complexities
- Leaving or returning to Australia
- Defining and tracking the steps to achieve financial freedom; and
- Protecting Assets and Income to support financial objectives.

Todd is a CERTIFIED FINANCIAL PLANNER® professional and a member of the Financial Planning Association (FPA). With a strong desire to continually improve his knowledge, Todd is currently studying his MBA through the Australian Graduate School of Management.

### Geoffrey Munday

**Authorised Representative Number: 242189**

Geoffrey Munday is a Senior Financial Planner with Silway Private Wealth and receives contracted payment related to client fee income.

Geoffrey began his career in Chartered Accounting in 1979 before working in senior finance and management roles in stockbroking, manufacturing and wealth management. He has been a licenced adviser since 2003.

Geoffrey brings a wealth of technical, finance and tax capability to his role whilst never forgetting that the role of money is to enable the important things in life.

Geoffrey is passionate about the provision of financial advice and during his career has assisted many clients to achieve their financial objectives. Some areas in which Geoffrey specialises include:



- Working with retirees and those looking to set themselves up for retirement
- Expertise to assist those who run their own business.

Geoffrey is a Fellow of the Institute of Chartered Accountants in Australia and New Zealand, a registered Tax Agent and a Justice of the Peace.

Consultum has authorised us to provide you with this Financial Services Guide.

## **What we do**

We are authorised by Consultum to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide financial advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

Todd Burnell and Geoffrey Munday are not authorised by Consultum to provide financial product advice in the following financial products:

- General Insurance Products

We are not authorised to provide any other financial services or financial products on behalf of Consultum.

Where we are unauthorised to provide you with a financial service or financial product that you are interested in, we will advise you of this and refer you to an alternative source of advice.

## **Contact us**

For more information on anything you have read in this FSG, to obtain a copy of our privacy policy or if there is anything else we can help you with, please contact us at:

Address: 5/68 Dilker Ave, VALENTINE NSW 2280

Phone: 02 4016 6599

Fax: 02 4016 6598

Email: [enquiries@silway.com.au](mailto:enquiries@silway.com.au)

Website : [www.silway.com.au](http://www.silway.com.au)

# Your confidence in our advice

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

## Our complaints procedure

If you're unhappy with the advice you receive, or other aspects of our service please follow the steps outlined below.

1. Please let your financial adviser know in the first instance. You can also raise your complaint at any time by contacting us at:

IOOF Advice Complaints  
Consultum Financial Advisers Pty Ltd  
Level 3, 30 Hickson Road,  
Millers Point NSW 2000

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

**Phone:** 1800 271 147

2. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

**Website:** <https://www.afca.org.au>

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Telephone:** 1800 931 678 (free call)

**In writing to:** Australian Financial Complaints Authority Limited  
GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers. Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Consultum holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by Consultum at the time of providing the advice but are no longer authorised representatives of Consultum at the time of your complaint.

# Payments and benefits we receive

You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- by direct invoice from us;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, via commission we may receive from a financial product provider when you commence an investment and ongoing commission during the life of the investment;
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time.

Please refer to the “How we charge for our services” section of this FSG for further information.

## Other payments we may receive

We will provide you with details of all fees, commissions or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

## Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

## Conferences

We may attend conferences and professional development seminars that have a genuine education or training purpose. Consultum, or our employer, may pay for the costs of our travel and accommodation, and events and functions held in conjunction with the conference or seminar.

## Non-monetary benefits

We maintain a public register outlining the alternative forms of remuneration that are payable to, and by us, e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting us. Please be aware that Consultum may charge you for the cost of providing this information to you.

## Sponsorship

Consultum receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and Silway Private Wealth do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

## Referrals

### Referrals from a third party

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

### Referrals to a third party

We have referral arrangements in place with third party providers. If we refer you to one of these providers, we may receive a payment, fee, commission or other benefit from those providers.

Details of these arrangements are set out in the table below and specific details of any referral payments we may receive will be provided in our advice documents to you. Alternatively, you can request further details about our referral arrangements prior to us providing you with financial advice.

**Table - Details of referral arrangements in place:**

<b>Name of referral partner</b>	<b>Services</b>	<b>Payment we will receive for referral</b>	<b>Example</b>
Scott Compton Financial Solutions by Design	Mortgage Broking	Up to 0.30% of the initial loan balance for new loans and up to 0.10% pa of the outstanding loan balance for existing loans	If you established a loan for \$500,000 we would receive up to \$1,500 upfront and nothing thereafter.  If you refinance an existing loan for \$500,000 we would receive up to \$500 upfront and nothing thereafter.

Please note that Consultum is not responsible for the advice and services provided by these providers.

### Death & TPD Succession/Estate planning

In the event of our death or permanent disablement, Consultum may acquire our client servicing rights. This helps manage the transition of ownership to ensure you continue to receive advice.

The value of any sale is based on an independent valuation of the business.

# How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

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<b>Initial consultation</b>	At our expense
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<b>Advice preparation</b>	<p>If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice:</p> <p>The minimum fee charged is \$1,650 while the maximum fee is \$22,000.</p> <p>For example, complex advice that contain multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation Funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum.</p>
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<b>Fixed Term Advice and Services Agreements</b>	<p>You can elect to enter into a 12 month Fixed Term Advice and Services Agreement as part of your financial planning strategy so you can receive advice services such as a meeting to review your plan. Details of the services will be set out in your 12 month Fixed Term Advice and Services Agreement.</p> <p>The fee can range from a minimum of \$1,650 while the maximum is \$22,000 or 2.5 % of the value of your portfolio each year. The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be outlined and agreed with you in the Agreement.</p> <p>For example, for investments valued at \$200,000 the maximum annual fee would be \$5,000 pa.</p> <p>Borrowed funds – if we recommend you acquire investments using borrowed funds then your annual fee will be a minimum of \$1,650 and a maximum of \$22,000 pa.</p>
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<b>Ad hoc advice</b>	Where you do not wish to participate in a 12 month Fixed Term Advice and Services Agreement but require ongoing advice on an ad hoc basis, an hourly fee of between \$440 may apply.
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<b>Execution only service</b>	Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of \$550 and a maximum of \$3,300 fee may apply.
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**Insurance products**

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

<b>Date policy is issued</b>	<b>Initial Commission (% of annual policy cost including GST)</b>	<b>Ongoing Commission (% of annual policy cost including GST)</b>
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

**Example** (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

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# Privacy Notification

Your personal information will be handled in accordance with our privacy policy, which is located on our website. We will generally collect personal information directly from you. We may collect personal information about you from a third party if we believe you have authorised that third party to provide the information to us.

The main reason we collect, use and/or disclose your personal information, is to provide you with the services that you request. In addition, as a financial service provider, we are obligated to verify your identity and the source of any funds. We provide financial services under the Australian Financial Services License of Godfrey Pembroke Group Pty Ltd who monitors our compliance with the law and provides us with a range of support services, including the financial planning software we use. As a consequence, Godfrey Pembroke has access to your personal information and may use that information to facilitate the provision of financial services to you and to ensure we are complying with our obligations.

We may also disclose your information to external parties such as your accountant, banks, insurers, and product providers.

In order to keep our costs competitive, our Practice uses specialist business support resources that are located in the following country/countries: India

The organisation/s we have contracted to support our business have confirmed to us they will adhere to the Australian Privacy Principles when dealing with your personal information. They will not contact you or share your information with any other party unless they have your express approval.

Please refer to our Privacy Policy For more information about how we will handle your personal information, including how to access or correct your personal information.

## Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal these complaints, by reading our Privacy Policy (by contacting us) or by referring to the 'Your confidence in our advice' section of this FSG.

## Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)