

1 July 2021



# Financial Services Guide

Part 1



This Financial Services Guide has been authorised for distribution by the authorising licensee:

Cygnet Financial Pty Ltd ('Cygnet Financial')

ABN 38 631 180 222

Australian Financial Services Licence No. 514528 ('AFSL')

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This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Cygnet Financial Pty Ltd ('Cygnet Financial'), Cygnet Advisory its Corporate Authorised Representative and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Cygnet Financial;
- Cygnet Financial as the holder of an AFSL;
- the financial services that Cygnet Financial offers;
- the process we follow to provide financial services;
  
- how we, our associates, and Cygnet Financial are paid;
- any arrangements which may influence our advice to you;
- how we and Cygnet Financial protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Cygnet Financial.

References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Cygnet Financial, Cygnet Advisory as a Corporate Authorised Representative of Cygnet Financial or your 'Authorised Representatives' of Cygnet Financial as the context requires

#### **Lack of independence**

Cygnet Financial Pty Ltd and its Authorised Representatives receive commissions from life risk insurance products held by our clients. As such, we are neither independent, impartial, or unbiased as defined in Section 923A of the Corporations Act.

# PART 1

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

## About Cygnet Financial

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Cygnet Financial holds an AFSL issued by the Australian Securities and Investments Commission.

As an Authorised Representative, we act on behalf of Cygnet Financial when providing the financial services, we are authorised to provide under the Cygnet Financial AFSL.

Further information on these services is set out in the FSG Part 2 Adviser Profile.

As the holder of an AFSL, Cygnet Financial is responsible for the financial services we provide to you. Cygnet Financial acts on its own behalf when these financial services are provided to you.

## SECTION 1

### Financial Services Guide

#### What other information should you consider before deciding whether to proceed with our recommendations?

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If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those

recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

#### Who provides the financial services described in this FSG?

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The financial services described in this FSG are provided by us as Authorised Representatives of Cygnet Financial.

Part 2 of this Guide contains further details about your financial adviser, and our experience, qualifications and professional memberships.

#### Who is responsible for those financial services?

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As the holder of an AFSL, Cygnet Financial is responsible for the financial services we provide to you. Cygnet Financial acts on its own behalf when these financial services are provided to you. In relation to the financial services offered in this FSG, Cygnet Financial, as the holder of an AFSL, does not act on behalf of any other person or licensee. Cygnet Financial is only responsible for the services offered in the FSG.

The law requires Cygnet Financial to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Cygnet Financial and/or its Authorised Representatives. Cygnet Financial has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

## What financial services do we offer?

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We are authorised, on behalf of Cygnet Financial to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide):

- deposit products;
- Government debentures, stocks or bonds;
- life investment and life risk products;
- managed investment schemes including investor directed portfolio services;
- retirement savings account products;
- securities (e.g. shares); and
- superannuation products.

Some of the services we can provide you (unless otherwise stated in Part 2 of this Guide) are:

- financial planning advice;
- wealth accumulation advice;
- superannuation advice, including self-managed superannuation funds;
- redundancy advice;
- retirement advice;
- cash flow advice;
- social security benefits advice;
- life and disability insurance advice;
- estate planning services (financial planning).

## What products are available?

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A range of financial products offered by many leading financial product providers are available to our advisers when they provide personal advice. Details of the available products our advisers are authorised to provide advice about are contained in the Approved Product List (APL).

Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from.

When providing personal advice to you, our advisers may only recommend a product to you if they consider it is appropriate after considering your objectives, financial situation and needs.

If no product on the APL suits your circumstances, our advisers may research products that sit outside the APL and seek

approval from the Cygnet Investment Committee to recommend a suitable product.

## How do we ensure that the personal advice we give you suits your needs and objectives?

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To ensure your adviser provides personal advice that is appropriate, we firstly need to understand your objectives, financial situation and needs. Your adviser (referred to as 'we' below) will follow a step-by-step process as outlined below:

- 1.) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
  - 2.) We will collect all the information we need from you, including your objectives, financial situation and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing all of this information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.
  - 3.) We will help you identify your goals and may discuss your attitude towards investment risk.
  - 4.) We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where we recommend a financial product, we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, an RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice.
- Where we recommend financial products, we will provide you with a PDS or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to invest in or acquire that product.

- 5.) We will discuss our recommendations with you, make any changes you require and ask you whether you would like us to implement those recommendations on your behalf.
- 6.) If you agree, we will then implement those recommendations.
- 7.) We will meet with you periodically to review your financial circumstances if we agree to an ongoing advice service arrangement which includes a regular review component. If an ongoing advice service arrangement is entered into, this will be documented in your Ongoing Advice Service Arrangement Letter and/or SoA.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further. In certain circumstances, we may not provide you with personal advice via a SoA or RoA, as outlined above. These circumstances may include:

- 1.) Where we provide you with only general advice, such as through seminars and newsletters;
- 2.) Further advice or verbal advice – if you previously received advice recorded in a SoA, any further personal advice provided by us may be recorded in a RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below).

### What documents do you get if we provide further advice?

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Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with a SoA for this further advice. Where this is the case, if you have not already been provided with a RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this Guide) for a period of seven years from when the further advice was first provided to you.

### How can you instruct us?

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You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out in Part 2

of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

### Other services

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We may facilitate the provision of services other than financial planning services. For example, accounting and legal work may be referred to third party service providers. This may include a referral to Cygnet Accounting. While we may provide these referrals, you should understand that these other services are not provided on behalf of Cygnet Financials' AFSL and Cygnet Financial does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

Examples of the services which Cygnet Financial is not responsible for include:

- general insurance services (e.g. car insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- credit activities
- consulting services; and
- administration and compliance of Self-Managed Superannuation Funds.

### How are we paid for our services?

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We and Cygnet Financial may receive:

- fees paid by clients;
- commissions paid by product providers;
- other payments by product providers; and
- other benefits.

All fees and commissions are payable to Cygnet Financial. Cygnet Financial may pay up to 100% of any fees and commissions to Cygnet Advisory who are a Corporate Authorised Representative of Cygnet Financial. Cygnet Advisory will distribute some, or all of this remuneration, to Allan Wise, Luke Naughtin and their staff.

Details of any fees, commissions or other benefits that we, Cygnet Financial or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

## What type of fees, commissions, payments and other benefits do we receive for our services?

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If the fees, commissions or other benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after. If you receive general advice you may request particulars of the fees, commissions and other benefits that we may receive, within a reasonable time after this FSG is given to you.

The types of fees, commissions and other benefits that may be received by us and by Cygnet Financial include the following:

### Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

### Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

### Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services.

This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the

time involved in reviewing your portfolio and circumstances.

### Referral fees

If we refer you to another business to provide you with services, we do not accept or receive any referral fees or payments.

### Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods.

Where it is debited from your investments it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

### Commissions

If you take out a financial product through us, Cygnet Financial may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees and or premiums you pay for the product. They are not an additional cost to you. We may agree to rebate some or all of these.

The commission payable for different classes of financial products include the following:

### Life Insurance Products

Initial and ongoing commissions from insurance providers may be received by Cygnet Financial Pty Ltd. These commissions are paid to Cygnet Financial Pty Ltd by the company that issues the product that we recommend to you and they are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer to Cygnet Financial. Ongoing commissions are payments paid by product issuers to Cygnet Financial in the years after the first year. These commissions may be passed onto "us".



If you initiate an increase to your cover, Cygnet Financial may receive an initial commission and ongoing commissions on the annual increase to your policy cost. The ongoing commission on a client-initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Cygnet Financial may receive up to 38.5% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Cygnet Financial may receive is set out in the table below:

Date a new product is issued	Initial commission (% of annual policy cost or increase excl. GST)	Ongoing commission pa (% of annual policy cost or increase excl. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 - 140%	0 - 38.5%
1 January 2018 - 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 - 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%

\* Cygnet Financial may receive the pre 1 January 2018 commission rates above from the product issuer if:

- > your policy was issued before 1 January 2018 and you exercise an option or apply for additional cover under your policy after 1 January 2018; or
- > your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

### Example

We recommend an insurance product to you and it is applied for and issued on 2 February 2018. The annual policy cost is \$450.

Cygnet Financial may receive up to \$360 (80% excl. GST) as an initial commission and may pass up to \$360 to Cygnet Advisory. Assuming the policy cost stays the same each year, Cygnet Financial may receive up to \$90 pa (20% excl. GST) as an ongoing commission and may pass up to \$90 pa to Cygnet Advisory.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to Cygnet Financial in respect of this increase will be \$80 (80% excl. GST) as the increase has occurred in 2018. The ongoing commission payable to Cygnet Financial in respect of this increased policy cost will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to Cygnet Financial in respect of this increase will be \$60 (60% excl. GST). The ongoing commission payable to Cygnet Financial in respect of this increase will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you. Where personal advice is provided to you, you'll also find details of the commission that Cygnet Financial and we are entitled to receive if you decide to purchase a life insurance product, in your SoA or RoA.

### Does Cygnet Financial charge any fees?

Cygnet Financial will not charge you any additional fees over and above what you are charged by Cygnet Advisory. However, it may retain up to 100% of all fees and commissions generated by its Authorised Representatives.

## **Other payments from product providers**

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### **Wrap, and other portfolio administration services**

Cygnnet Financial does not receive any additional payments from any wrap or portfolio administration service provider.

## **Other benefits**

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From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefits we receive which are valued between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes.

A copy of the register is available on request for a small charge.

## **Will any other parties benefit from the financial services offered in this FSG?**

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Cygnnet Financial may benefit from remuneration paid in respect of the financial services offered in this FSG.

Allan Wise and Luke Naughtin, as Authorised Representatives of Cygnnet Financial may also benefit from the services provided by Cygnnet Accounting and SuperB2B Pty Ltd, in the form of dividends.

## **What arrangements may influence our advice to you?**

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Cygnnet Financials' Approved Product List includes a range of financial products from product providers not associated with Cygnnet Financial.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

## **What fees do we pay to someone who refers you to us?**

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If you are referred to us, we do not pay the referrer a fee. However, we may provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.



## SECTION 2

# PRIVACY STATEMENT

### Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

### Collecting and disclosing your personal information

We may disclose your personal information to anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply

with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Cygnnet Financial is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing

financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

### Other important information

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available at [www.cygnnetgroup.com.au](http://www.cygnnetgroup.com.au). It covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and;
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

## Definitions

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“We”, “our”, “us” means Cygnet Financial, Cygnet Advisory as a Corporate Authorised Representative of Cygnet Financial and its Authorised Representatives.

## SECTION 3 ARE YOU SATISFIED?

### What to do if you have any concerns about our services

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Both we and Cygnet Financial endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1.) Contact your Adviser in the first instance, about your concern.
- 2.) If your concern is not resolved to your satisfaction, you may contact Cygnet Financial by:  
  
**Writing to:**  
Manager  
Advice Complaints  
Cygnet Financial Pty Ltd  
Level 8, 356 Collins Street Melbourne Vic 3000  
PO Box 16110 Collins Street West Vic 8007  
  
**Email:**  
admin@cygnetgroup.com.au
- 3.) We will review your concerns and provide a full written response within 30 days of receipt of your complaint, unless the matter is complex or circumstances beyond our control delay the management of your complaint.  
If this occurs, we will notify you within 30 days of the reason for the delay and provide you the option to escalate the matter to AFCA if you are dissatisfied. If you disagree with our final response to your complaint, you may also escalate your concerns to AFCA, at no cost to you. AFCA can be contacted in the following ways:

**Writing to:**

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001

**Email:**

info@afca.org.au

**Website:**

www.afca.org.au

**Phone:**

1800 931 678

- 4.) The Australian Securities & Investments Commission (ASIC) is Australia’s corporate, markets and financial services regulator. ASIC contributes to maintaining Australia’s economic reputation by ensuring that Australia’s financial markets are fair and transparent and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

**Writing to:**

Australian Securities & Investments  
Commission  
GPO Box 9827  
Your Capital City

Or

PO Box 4000  
Gippsland Mail Centre  
Victoria 3841

**Website:**

www.asic.gov.au

**Phone:**

1300 300 630

- 5.) The Financial Planning Association of Australia Limited (FPA), is the peak professional body for financial planning in Australia. The FPA provides the leadership and professional framework that enables members to deliver quality financial advice to their clients. All FPA members are bound by professional, technical and ethical standards as provided in the FPA Code of Professional Practice. The FPA has effective and appropriate policies and procedures

in place to assist you with your complaint and ultimately help protect consumers and those planners doing the right thing. You may contact the FPA by:

**Writing to:**

The Investigations Manager  
Financial Planning Association of Australia  
Ltd  
GPO Box 4285  
Sydney NSW 2001

**Website:**

[www.fpa.asn.au](http://www.fpa.asn.au)

**Phone:**

1300 626 393

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.