

Financial Services Guide Part1

1 February 2022

Version 1.4

This Financial Services Guide (FSG)

is an important document that outlines the type of products and services the licensed entity below is authorised to provide under the Australian Financial Services License (AFSL). This document is Part 1 of our Guide and should be read in conjunction with 'Part 2 – Authorised Representative Profile, which will be given to you with this Guide. The two parts make up the Guide. The financial services we refer to in this FSG are offered by:

GPS Wealth Ltd
ABN 17 005 482 726 | AFSL 254544 (GPS);
info@gpswealth.com.au

referred to within this FSG as 'we', 'us', or 'our'. Where these terms appear in this document you should associate them with GPS Wealth Ltd.

The FSG contains information about:

- who we are and how we can be contacted;
- the financial services that we provide;
- how we and other relevant parties are remunerated;
- when we provide those services;
- important matters relating to our relationships with third parties;
- how to get details on our privacy policy;
- how we resolve disputes, and what you should do if you have one.

Who are we?

GPS is a wholly owned subsidiary of ASX-listed entity Diverger Limited (ASX: DVR) (**Diverger**). GPS authorises the distribution of this FSG.

GPS, as the Licensee manages financial planners operating as authorised representatives of GPS, (collectively, '**Advisers**'). Under these arrangements GPS provides client engagement services, training, licensing, compliance, investment advice, and support services to the Advisers. GPS does not provide legal advice and we do not make any representations about the current or future value of any investments that you acquire, vary, or dispose of through us. You should always make your own enquiries. Before seeking our financial product advice you may have a number of questions you would like to ask us. We provide you with this FSG prior to the provision of any financial product advice and we recommend that you read it as it contains answers to some of the questions you might have.

Why we are not Independent

GPS is part of the Diverger Limited (**Diverger**) group of companies. Diverger offers a series of managed accounts called CARE managed portfolios for which it receives fees, and also offers our clients a choice of paying for Insurance advice via a fee or commissions or a combination. Additionally, HUB24 Limited (an ASX listed provider of investment administration platform and technology services) is a material shareholder of Diverger. These relationships restrict GPS from being referred to as independent, impartial or unbiased.

Who is responsible for the financial services described in this FSG?

GPS is responsible for the financial services provided to you. We have authorised the Corporate Authorised Representative and the Authorised Representatives identified in Part 2 of this FSG to provide financial services to you. Information about your adviser is detailed in Part 2 (Authorised Representative Profile) of this Guide.

How to instruct us

We expect that you will provide us with instructions in person, but you can also give us instructions via email. In some cases, we may require you to sign original documents (such as product application forms) or meet identification requirements.

We can be contacted at **GPO Box 4463, Sydney, 2001; Level 7, 115 Pitt St, Sydney 2000; by phone on 02 8074 8599**; or via email at **info@gpswealth.com.au**

If we give you personal financial advice we will provide you with a Statement of Advice. To make sure that advice is appropriate to you we must make reasonable enquiries about your current financial situation and future needs. In the Statement of Advice we will tell you about:

- the scope of the advice;
- your current personal and financial position;
- our understanding of your goals and objectives;
- the Advice, strategies and the financial products and services we recommend and the reasons why, any risks and how it addresses your goals and objectives;
- any fees and charges payable and any other benefits we may receive;
- any associations or conflicts we have with Financial Product Issuers or other parties which may have influenced the advice we give you.

If we provide further personal advice to you after we have issued a Statement of Advice and your circumstances have not significantly changed, we may provide the advice to you orally. We will also tell you about any fees or commissions and any associations with Financial Product Issuers or others who may have influenced that advice. We will record these details in a Record of Advice and keep this for seven years after providing the advice to you and you can request a copy of that Record from your adviser.

If we recommend to you a particular Financial Product we will give you information about the particular Financial Product – a Product Disclosure Statement– to help you make an informed decision about the Financial Product.

Complaints

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms. If you have a complaint about any of our advice you should take the following steps.

Contact your Licensee Representative:

In the first instance please contact the Licensee representative who provided you with the particular service and tell them about your complaint. They will then try to resolve your complaint quickly and fairly.

Internal Dispute Resolution:

If you have raised your concern with your Licensee representative and the matter has not been resolved to your satisfaction, our Dispute Resolution Department can assist. There are three ways you can lodge your complaint:

By telephone:	Call 02 8074 8599, between 8.30am - 5.00pm Monday to Friday (AEST).
In writing (by mail):	Mail your written complaint to: Complaints Manager Diverger GPO Box 4463, Sydney NSW 2001
By email:	complaints@diverger.com.au

Once you have contacted Diverger, we will begin the process of investigating and resolving your complaint. We will endeavour to resolve your complaint quickly and fairly, generally within 5 business days. However, some complaints do take more time than others. We expect to resolve all complaints within 30 days. If do not resolve your complaint within 30 days we will advise you of the reasons for the delay, your right to contact AFCA if you are dissatisfied, as well as AFCA's contact details.

Complaints (continue)

External Dispute Resolution

If you do not feel your complaint has been resolved in a satisfactory manner, or if you have not received a response after 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free for you to use.

AFCA can be contacted as follows:

By telephone:	1800 931 678 (free call)
In writing (by mail):	Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
By email:	info@afca.org.au
Website	www.afca.org.au

The Australian Securities and Investments Commission (ASIC) also has a free call Info line on 1300 300 630 which you may use to make a complaint or obtain information about your rights.

You may also contact ASIC by writing to:

In writing (by mail):	Australian Securities and Investment Commission GPO Box 9827, Sydney NSW 2001
Website:	www.asic.gov.au

What is our advice process?

Our advice to you is principally about developing appropriate strategies to achieve your financial goals, taking into account your current circumstances.

The two types of advice that can be provided by our Advisers are:

- **Personal Financial Advice**
under Personal Advice we provide you with advice which takes into account your personal objectives, goals, financial situation, and needs. Where we provide you with Personal Financial Advice we will provide you with an advice document.
- **General Financial Advice**
General advice does not take into account your personal objectives, goals, financial situation, or needs. Where we provide you with General Financial Advice we will not provide you with an advice document.

Our Advisers meet strict education and training requirements and are supported by a team of investment and product specialists.

What financial products and services are we authorised to provide advice on?

We act for you when giving advice and arranging financial products. GPS is authorised to provide financial product advice on, and deal in, the following classes of financial products:

- Basic deposit and payment products;
- Retirement savings accounts;
- Government debentures, stocks, or bonds;
- Securities, which includes shares and debentures;
- Life products, including investment life products;
- Standard margin lending facilities;
- Interests in managed investment schemes, including investor directed portfolio services ('IDPS' or 'Wrap'); and
- Superannuation and self-managed superannuation funds.

Our internal investment team, supplemented by external experts, provides financial product research, which is used to carefully select and maintain an extensive list of approved products ('**APL**') for our authorised representatives to use when providing personal advice. We will predominantly recommend products on our APL, but may, dependent on particular circumstances, include investigating and recommending products which are not on the APL.

Important Note

Individual GPS Advisers may only be authorised to provide advice in some of the above areas. Please refer to Part 2 (Authorised Representative Profile) or their individual authorisation certificate, which sets out the areas they are authorised to provide advice.

Other services

Some Advisers may provide services other than financial product advice services through separate business arrangements to their financial planning businesses. These other services are not provided under the GPS AFSL and GPS does not train, support, or supervise the provision of these other services and has no responsibility in relation to those services. Examples of the services for which the Licensees are not responsible include, but are not limited to:

- General insurance services (for example, car insurance);
- Real estate and direct property advice;
- Taxation services, such as completion of tax returns;
- Accounting and audit services;
- Legal services;
- Consulting services;
- Lending services; and
- Administration and compliance of self-managed superannuation funds.

How do you pay for our services?

We will discuss and agree our fee structure with you before we provide you with services. Fees received in relation to the provision of services can be through the following methods:

- Fee for service (meaning any of the following: a fee for providing a Statement of Advice, a management fee, an ongoing advice or services fee, or any fee that you will pay for the service);
- Receipt of commissions from insurance providers; or
- A combination of any of the above.

Fees may be charged on the basis of an agreed rate per hour, a composite fee for the agreed set of services, or on a percentage of assets advised upon.

Further information in relation to fees and charges charged by your Adviser are detailed in Part 2 (Authorised Representative Profile).

Details of fees, commissions, or other benefits that we are entitled to receive in relation to a specific financial product recommendation will be disclosed to you in dollar and percentage terms in an advice document. In circumstances where an amount or percentage is not known at the time of providing advice, an estimate will be provided. Your Adviser will be able to explain how fees have been calculated.

If you elect to receive ongoing advice services from your Adviser, fees are applied based on the desired frequency of contact with your Adviser and the complexity of your circumstances. These fees may be a fixed dollar amount or an asset-based fee or a combination of the two. Asset-based fees will generally not exceed 1.1% per annum (inclusive of GST) of the total value of your portfolio.

The fee rate ranges may vary depending on the complexity and nature of the work undertaken and type of advice provided. In some circumstances due to the complexity of the advice being sought, a fee may be charged that falls outside of this range.

Where we receive commission in respect of placement of insurance, we will receive an upfront commission of up to 66% (inclusive of GST) of the initial premium, and ongoing commission of up to 22% (inclusive of GST) of renewal premiums. Commissions, whether up-front or ongoing, are

paid to us by the Insurer. For example, for an insurance product with an annual premium of \$2,000, where the issuer pays your adviser an upfront commission of 66%, GPS will receive \$1,320. The issuer will pay GPS 22% of the annual premium as ongoing commission for as long as you hold the product. Assuming an annual premium of \$2,000, this equates to \$440 per year. Amounts noted here are inclusive of GST.

All fees and commissions relating to financial advice provided to you are payable to your Licensee, who may pass up to 100% of those fees onto your Adviser. Please refer to Part 2 for that proportion.

Other fees and charges may be payable by you to the product provider depending on the recommendations in the Statement of Advice (SOA). These fees might include administration fees, investment fees, establishment fees, and other charges levied by the product provider. These fees and charges will be disclosed in their Product Disclosure Statements (PDS) or other documents provided to you.

What other remuneration may be paid to GPS

We and our Advisers may receive some or all of the following types of remuneration, in addition to the remuneration disclosed above, in recommending strategies which will be outlined in your SOA:

Referral arrangements

Under the Financial Planners and Advisers Code of Ethics your Adviser is not permitted to directly receive any referral fees for acting on your behalf. Referral fees may, however, be paid to your Adviser's employer, or your Licensee.

We will also not refer to a third party, or provide advice, in circumstances where there is a conflict of interest, unless it can be shown that this course of action is demonstrably in your best interest, and with your prior informed consent. If there is a conflict of interest such that it is not demonstrably in your best interest, then we will decline to provide that advice. We require all of our Advisers to conduct due diligence on referral partners to ensure that referral partners are only recommended where they meet this requirement.

Other relationships which might influence GPS in providing financial advice services

Hub24 Limited

Diverger Limited (Diverger), an ASX listed company, is the owner of GPS Wealth. HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Diverger.

The Hub24 platform is available to our GPS Wealth advisers through an approved product list. Our advisers are obliged to always act in a client's best interests and will only recommend the use of the Hub24 platform if it is appropriate to do. We also continue to use other platforms to implement our investment advice and you are free to request your adviser use an alternative platform if you would prefer. Importantly, no GPS Wealth adviser or practice is under any incentive, sales target, or obligation to recommend the Hub24 platform.

CARE Managed Accounts

DWA Managed Accounts Pty Ltd (AFSL 264125), a wholly owned subsidiary of Diverger, will receive fees for the provision of investment advice in their role as investment adviser to the CARE investment process (please contact your Adviser for more details of our CARE investment process). Any such fees will be outlined in the SOA, should it be applicable, and relate to the work done by DWA Managed Accounts Pty Ltd's Investment Committee in maintaining the CARE portfolios.

The CARE Portfolio Management fee is 0.297% (inclusive of GST) of funds invested as part of CARE. For example, if your account balance in the CARE Managed Account facility was \$100,000, the fee would be \$297 (inclusive of GST) for that year.

No part of this fee is paid to GPS or the Adviser.

Alternative remuneration

In accordance with industry requirements and the law, the Licensee and your Adviser each maintain an Alternative Remuneration register that contains information about any alternative forms of payments or benefits over \$100 that may be received (e.g. tickets to events and conferences). Benefits that are identical and similar and given on a frequent basis are prohibited if they total more than \$300 in any one year. If you wish to inspect the Alternative Remuneration register or ask any questions about this, please ask your Adviser.

Your Adviser may not receive one-off benefits in excess of \$300 per annum from any individual service provider, or benefits that exceed \$300 per annum for a series of benefits from the same provider.

Professional development education support

The Licensee may receive funds for education support from various product providers. Funds associated with this support must be used in the education and training of advisers.

Professional indemnity

GPS holds a professional indemnity ('PI') insurance policy, which complies with the requirements for compensation arrangements under the Corporations Act (subject to its terms and conditions), covering claims relating to the professional services provided by the Licensee and the Advisers.

The PI insurance policy covers advice in relation to professional services provided by Advisers while authorised by the Licensee, even where that representative has subsequently ceased to be an authorised representative of the Licensee.

Privacy

Your privacy is important to us. In general, we collect and verify information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs, and to make certain that we comply with our legal obligations.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services you are seeking within the time periods contemplated.

Information acquired by us in the course of providing our services may be provided to external service providers (in Australia or Overseas), product and platform providers, auditors, taxation and legal advisers, and information technology consultants. If you do not agree to the transfer of your personal information outside Australia, please contact us. We may also use your information to comply with legislative or regulatory requirements in any jurisdiction.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our privacy policy is on our website. Otherwise, if you contact us, we can send you a copy.

Privacy Collection Statement

We collect and verify personal information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs and to make certain that we comply with our legal obligations under the Privacy Act 1988 (Cth) and under the Corporations Act 2001 (Cth). This Privacy Collection Notice forms part of our Privacy Policy, and together they form our notice for collecting personal information under Australian Privacy Principle 5.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete, or inaccurate information we may not be able to provide you with the products or services you are seeking within the time periods contemplated. For a complete list of the information we may collect and verify please see our Privacy Policy.

If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Personal information acquired by us in the course of providing our services may be provided to external service providers, product and platform providers, auditors, taxation and legal advisers and information technology consultants. Otherwise your personal information will not be disclosed unless:

- Australian law requires us to; or
- you authorise us to disclose it to a 3rd Party on your behalf, e.g. your tax adviser.

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, Sri Lanka, Singapore, United Kingdom, Philippines, India and the United States of America. Details of the countries we disclose to you may change from time to time. You can contact us for further details regarding where we may send your personal information.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

Some of our financial advisers may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our Privacy Policy is on our websites. Otherwise if you contact us, we can send you a copy.



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