

FINANCIAL SERVICES AND CREDIT GUIDE

SANCTUARY FINANCIAL SERVICES PTY LTD

Version: 2.0

Date prepared: Wednesday, 30 November 2016



It is important that you read this Financial Services and Credit Guide (FSCG). It contains information that will help you decide whether to use any of the financial services offered by us, as described in this guide, including:

- who we are and how we can be contacted
- the advice and services we provide
- information about our licensee Hillross Financial Services Limited (Hillross)
- our fees and how we, your adviser and Hillross, are paid in connection with those services
- how we manage your private information
- how you can complain about a matter relating to us or Hillross

Documents you may receive

We will provide you with a number of documents as you progress through our financial planning process to capture each stage of your advice journey. We may provide these documents to you electronically to your nominated email address, unless otherwise agreed.

When we provide personal advice it will normally be documented and provided to you in a Statement of Advice (SoA), known as a financial plan. The financial plan contains a summary of your goals and the strategies and any financial products we may recommend to achieve your goals. It also provides you with detailed information about product costs and the fees and other benefits we and others will receive, as a result of the advice we have provided.

If we provide further personal advice a financial plan may not be required. We will keep a record of any further personal advice we provide you for seven years. You may request a copy of such records by contacting our office during that period.

When we provide credit advice we will conduct a preliminary assessment to determine the suitability of a particular product. This is normally documented and provided to you in an SoA, a record of debt advice or a Credit Proposal. We will retain a record of the debt advice which you may request by contacting our office within seven years of the assessment.

If we recommend or arrange a financial product for you we will provide a product disclosure statement (PDS) or investor directed portfolio service (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks as well as the costs you will pay the product provider to professionally manage that product.

You should read any warnings contained in your advice document, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

About our firm

Summary of the business

Name	Sanctuary Financial Services trading as Sanctuary Financial Services Pty Ltd
Australian Business Number	57 096 993 510
Authorised representative number	247816
Credit representative number	369138

Our office contact details

Address	Caldarra Court, Level 1, Suite 12 1008 Old Princes Highway, Engadine, NSW 2233
Phone	02 95482326
Fax	02 95482328
Email	michael.schnabel@hillross.com.au
Website	www.sanctuaryfs.com.au

This guide provides information about our advisers including their contact details, qualifications, experience, the services they may offer and financial products they can provide advice on.

Our advice and services

We can provide you with personal and general advice about specific services and financial products listed below. We can also arrange for financial products to be issued without advice from us.

Individual advisers within our firm may not be qualified to provide advice in all of the services and products noted below. Their individual profile guides will note any limitations to the advice they are qualified to provide. At all times we will ensure the appropriate adviser is available to you to provide advice consistent with your goals.

The following table sets out the areas of advice we can help you with as well as the products and services we can arrange.

Any additional advice or services we can offer you, or limitations to the list below, will be outlined in **Our Financial Advisers and Credit Advisers** on page 15.

We can provide advice on	We can arrange the following products and services
— Investments strategies (strategic asset allocation)	— Superannuation, including retirement savings accounts
— Budget and cash flow management	— Self-managed superannuation funds (SMSF)
— Debt management (including borrowing for personal and investment purposes)	— Borrowing within your SMSF
— Salary packaging	— Managed investments
— Superannuation strategies and retirement planning	— Investor directed portfolio services (for example, administration platforms)
— Personal insurance	— Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)
— Centrelink and other government benefits	— Standard margin loans
— Ongoing advice and services, including regular portfolio reviews	— Retirement income streams, including pensions and annuities
— Aged care	— Personal and group Insurance (life cover, disability, income protection and trauma)
	— Life investment products including whole of life, endowment and bonds
	— Arranging for listed securities, shares and debentures to be bought and sold via a platform and broker.
	— Where an administration platform is recommended, we also offer a Limited Managed Discretionary Account service
	— Limited selection of investment guarantees

Hillross maintains an approved products and services list, which includes products issued by AMP companies and a diversified selection of approved Australian and International fund managers. These have been researched by external research houses as well as our in-house research team.

Hillross periodically reviews these products to ensure that they remain competitive with similar products that address similar client needs and objectives. Generally, we recommend products that are on the approved products and services list. However, if appropriate for your needs, we may, subject to Hillross' approval, recommend other products.

A copy of the approved products and services list can be supplied to you upon request.

If we recommend a new platform or portfolio administration service, we use those issued or promoted by the AMP Group or as otherwise approved by Hillross and where appropriate to your circumstances.

The lenders and lessors whose products are most commonly recommended by Accredited Mortgage Consultants authorised by Hillross are:

Lenders	—	AMP Bank	Lessors	—	Macquarie
	—	ANZ		—	Esanda
	—	NAB Broker (Homeside)		—	Westpac
	—	Commonwealth Bank		—	Commonwealth Bank
	—	Macquarie Bank			
	—	Westpac			
	—	ING Direct			
	—	Suncorp			
	—	St George Bank			
	—	Bankwest			
	—	AFG Home Loans			

Tax implications of our advice

Under the Tax Agent Services Act 2009, Sanctuary Financial Services Pty Ltd is authorised by the Tax Practitioners Board to provide tax (financial) advice services on matters that are directly related to the nature of the financial planning advice provided to you. We will not consider any other tax matters in our advice to you. Where tax implications are discussed they are incidental to our recommendations and only included as an illustration to help you decide whether to implement our advice.

Transaction services

If you do not require advice, we can also arrange for you to apply for limited types of financial products where we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without our advice, we will ask you to confirm your instructions, which we will document in writing. You can ask us for a copy of this documentation at any time.

Your relationship with us and using our services

You can contact us directly with any instructions relating to your financial products. This includes giving us instructions by telephone, mail or email. We can only accept your instructions via email once you have signed an authority form.

We will work with you to agree what advice and services we will provide and when and how often we will provide them.

Where you agree to ongoing advice and services, the details will be documented and provided to you in a service agreement. This includes the frequency of contact between us, service standards that may apply, any ongoing fee arrangements and how the service can be terminated.

If at any time you wish to terminate your relationship with us, please contact us using the details shown in this guide.

Providing information to us

It is important that we understand your circumstances and goals, so that we can provide you with appropriate advice and services. You have the right not to provide us with any personal information. Should you choose to withhold information, or if information you provide is inaccurate the advice or services we provide you may not be appropriate for you.

It is also important that you keep us up to date by informing us of any changes to your circumstances so we are able to determine if our advice continues to be appropriate.

Our fees

The fees charged for our advice and services may be based on a combination of:

- A set dollar amount; or
- A percentage based fee.

Our agreed advice and service fees may include charges for:

- Initial advice
- Ongoing advice

Please note that for services in relation to insurance, banking deposit products, some loan products and older investment products, commissions may be paid by the product provider as follows:

- Initial commission - a percentage of the value of your investment contributions, loan balance or insurance premiums, and
- Ongoing commission - a percentage of the value of your investment balance, outstanding loan amount or premiums, usually calculated at the end of each month in which you hold the investment or loan, or on renewal of insurance products.

Payment methods

We offer you the following payment options for payment of our advice fees:

- BPAY, direct debit (savings), credit card or cheque
- Deduction from your investment

All fees and commissions will be paid directly to Hillross as the licensee on our behalf. They retain a percentage (as a licensee fee) to cover their costs and the balance is passed on to us. The percentage is determined annually, based on a number of factors, including our business revenue for the prior year.

Other costs

Where other costs are incurred in the process of providing our advice and services to you, you will be liable for these costs. However, we will agree all additional costs with you prior to incurring them.

Other benefits we may receive

The following is a list of benefits we may receive other than those explained above. These are not additional costs to you. These benefits may be monetary or things like training, events or incentives we are eligible for.

In addition to the payments we may receive for our advice and services, we may receive other support services. These can include financial and training assistance, prizes and awards or events in recognition of financial planning excellence and innovation, and business performance.

We may also participate in business lunches or receive corporate promotional merchandise tickets to sporting or cultural events and other similar items.

Hillross incentive program – Short-term reward

We may be eligible for additional payments as a short term recognition from Hillross, based on the contribution our firm makes to the overall revenues received by Hillross from product issuers. These payments are described in the section Arrangements with third parties for platforms section of the guide.

It will only be payable if our firm contributes \$150,000 or more in a calendar year to these revenues. The rate of payment begins at 2% of the contribution and increases to a maximum of 26% as the level of our contribution to the Hillross payments increase. The maximum percentage applies where the revenue contribution exceeds \$4 million. For example, if over time the accumulated recommendations our firm has made, including those from this current calendar year, result in Hillross

receiving \$150,000 in total revenues from all relevant product issuers, then we will receive \$3,000 as short term reward payments.

Any payments due to us are determined twice a year in arrears at the end of June and December, and payments made three months later. Eligibility in any one period does not automatically mean that we will continue to be eligible for any payments in future periods. These payments are in addition to other payments described in this section, and are not an additional charge to you.

Development, management and advice recognition

We may qualify to receive a DMA payment to recognise and reward our growth and professionalism. The DMA payment is based on a rate, calculated once per year, and determined by our ranking relative to other Hillross firms. Up to 60% of all Hillross firms may qualify for DMA payments. The rate may range from 0% to 5%, depending on our ranking. It is then applied to our firm revenue and paid to us once a year.

For example, if our DMA is set at 1% and our revenue for the year was \$200,000, we would receive a total of \$2,000 for that year.

How our performance is ranked

Our practice ranking is based on a scorecard, with points received for the quality of our services, compliance (audit results), our business goals and our engagement with clients through a measure called Advice Growth Index (AGI). AGI measures the value of our fee for service payments and our clients' product holdings over the previous year.

Placement fees

From time to time Hillross will receive fees from brokers or product issuers (including AMP group companies) for arranging client participation in Initial Public Offerings (IPOs) of securities (such as shares and rights issues). The fee, which is generally a percentage of the fee paid to the broker, varies from offer to offer and by the level of participation by Hillross. We may share in this fee based on the level of participation by our clients.

Business buy back option

If we leave the financial services industry, Hillross makes available a facility for its authorised representatives to transfer their clients. If this happens, Hillross may buy back the servicing rights of our clients. The facility is subject to certain conditions (such as, reason for sale, time the firm has been operating with Hillross, level of adherence to Hillross compliance requirements and achieving a satisfactory level of customer service), and provides a minimum value for our register of clients. The minimum value is based on a multiple of firm revenue. If at some future time we should look to sell our firm, and we cannot find a willing buyer, Hillross may purchase the servicing rights of our clients in these circumstances.

Annual advice conference

The advice conference is an annual event which offers advisers the opportunity for professional development and to hear updates on AMP's thinking about the future of advice. Hillross subsidises the costs of the advisers attending. The value will depend upon a range of factors, including the nature of the courses and events planned.

Educational support

Hillross rewards individuals with educational support if they meet certain qualifying criteria. The qualifying criteria may vary, and is normally based on the standard of our financial planning services and our business performance.

Relationships and associations

It is important that you are aware of the relationships that Hillross has with providers of financial services and products as they could be seen to influence the advice you receive.

About our licensee

Hillross Financial Services Limited

ABN 77 003 323 055

Australian Financial Services and Australian Credit Licensee

Licence No: 232705

Hillross is a member of the AMP Group and has:

- Approved the distribution of this FSCG
- Authorised us to provide advice and other services as described in this FSCG
- Authorised us to provide credit assistance services to you

Hillross' registered office is located at 33 Alfred Street, Sydney, NSW 2000.

About the AMP Group

Hillross is a member of the AMP group of companies. We can provide advice on products from a wide range of financial product providers, some of which are part of the AMP Group and as such Hillross is affiliated with:

- | | |
|--|---|
| — The National Mutual Life Association of Australasia Limited* | — AMP Capital Funds Management Limited |
| — National Mutual Funds Management Limited | — AMP Capital Investors Limited |
| — NMMT Limited | — AMP Superannuation Limited |
| — N.M. Superannuation Pty Limited | — AMP Life Limited |
| — Multiport Pty Limited | — Cavendish Superannuation Pty Ltd |
| — ipac asset management limited | — Australian Securities Administration Limited (ASAL) |
| — AMP Bank Limited | — Super IQ Pty Ltd |

*The National Mutual Life Association of Australasia Limited will cease issuing products on 31 December 2016. On 1 January 2017, the life insurance business of this company will transfer to AMP Life Limited.

If we recommend a product issued by the AMP Group or a third party product issuer, they will benefit from our recommendation by receiving product, administration and investment fees, as well as fees paid by fund managers to distribute their product. These fees are all disclosed in the relevant PDS or IDPS guide.

Authorised representatives and/or staff employed in our business may hold shares in AMP Limited, whose share price may be favourably affected by the sale of products issued by AMP Group companies.

Hillross' relationships with other companies

Issuers of products do not pay to be included on the approved products and services list.

Product issuers or service providers that have been selected for inclusion may pay AMP Services Limited the following benefits up to the following amounts (these are all inclusive of GST):

- A fixed payment of up to \$495,000 for risk insurance products.
- 0.2% plus a fixed payment of up to \$195,000 for investment products.

- 0.1% for insurance products.

For example, if total funds under administration for a particular investment product is \$10 million, the issuer may pay AMP Services Limited up to \$215,000 annually.

Our firm does not receive any part of these payments. From time to time, product issuers have access to Hillross and its authorised representatives to provide education as well as give training on their products.

Arrangements with platform providers

Margin lenders may make payments to AMP Services Limited of up to 0.55% pa (including GST) in respect of margin loans calculated on the outstanding balance of a loan. Payments are normally made monthly. As an example, for each \$10,000 of an interest only loan, the payment would be \$55 over a year. However, for other loans, the payments will vary as interest is charged and principal is repaid. Our firm does not receive any part of the payments received by AMP Services Limited, although we may indirectly participate in these payments through the Hillross incentive program referred to earlier in this Guide.

The Personalised Portfolio (PP) platform

The Personalised Portfolio Platform is operated by AMP Capital Investors Limited (AMP Capital). If you invest in the PP platform your fees are payable to AMP Capital. AMP Capital passes a portion of these fees on to other AMP group companies and associates, including:

- Hillross for investment research and platform support services;
- us for any wealth management services provided; and
- if you invest in a model portfolio or managed fund managed by AMP Capital or Hillross, they may also receive investment management and performance fees based on your investment in their investment options;
- Australian Securities Administration Limited for the administration services they provide.

Payments made to AMP group companies are generally calculated as a percentage based on the amount of money you have invested in the PP platform or, for any investment management and performance fees, for a particular investment option.

Up to 100% of the administration fees you pay for the PP platform may be notionally allocated to Hillross. The notional allocation may indirectly affect the payments we receive through the Hillross incentive program, which is referred to earlier in this Guide.

Further details about the fees and costs of investing in the PP platform are detailed in the product disclosure statement for the PP platform.

PortfolioCare Platform

The PortfolioCare range of administration services are issued by companies in the AMP Group. These companies have an agreement with Asgard Capital Management Limited (Asgard) under which Asgard administers the PortfolioCare administration services in addition to administration and support services also provided by AMP companies.

If you access a product in the PortfolioCare range, then administration and, where applicable, custodial share and trustee fees are deducted from your account. These fees, as set out in the product disclosure statement or IDPS Guide, are paid to Hillross after deduction of expenses for administration and support services described above.

A full description of the fees is in the relevant product disclosure statement or IDPS guide for the relevant service. Our firm does not receive any part of the payments received by Hillross.

Hillross may also qualify for a share of the profit on the life insurance business taken out through the PortfolioCare platform. The profit is based on the claims experience for that business and total premiums received. The AMP Group is paid a portion of that profit by the insurer, some of which is passed on to Hillross.

These payments are not shared with us although we may indirectly participate in these payments through the Hillross incentive program, which is referred to earlier in this Guide.

Definitive Wrap platform

If you access a product through the Definitive platform, which is operated by Macquarie Investment Management Limited (MIML), then the administration fees are deducted from your account within that platform and paid to Hillross. MIML is paid a fee by Hillross for administering this platform. The administration fees are not shared with us although we may indirectly participate in this payment through the Hillross incentive program which is referred to earlier in this Guide.

Further details about the fees and costs of investing in the Definitive Wrap platform are detailed in the product disclosure statement/IDPS guide for the Wrap platform.

Confidence in the quality of our advice

If at any time you feel like you are not satisfied with our services, the following will help you understand your options and find a resolution.

- Contact your adviser and tell them about your complaint.
- If your complaint is not satisfactorily resolved within three days, please contact AMP Advice Complaints on adviceComplaints@amp.com.au, or put your complaint in writing and send it to:

Attention: National Manager, Advice Complaints

Level 12, 33 Alfred Street
Sydney, NSW 2000

- AMP Advice Complaints will try to resolve your complaint quickly and fairly.
- If your complaint has not been resolved satisfactorily, you may escalate your complaint to one of the following External Dispute Resolution Schemes listed in the following below.

<p>Any issues relating to financial advice, investments, superannuation or insurance matters</p>	<p>Financial Ombudsman Service (FOS) GPO Box 3 Collins Street West Melbourne Victoria 3001 1300 780 808 www.fos.org.au info@fos.org.au</p>
<p>Any issue relating to your personal information</p>	<p>The Privacy Commissioner GPO Box 5218 Sydney NSW 2001 1300 363 992 privacy@privacy.gov.au</p>

You may also contact the **Australian Securities & Investments Commission (ASIC)** on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights. You can also contact the **Financial Planning Association (FPA)** at www.fpa.asn.au to make a complaint (please note that the FPA cannot award compensation).

Professional indemnity insurance

We maintain professional indemnity insurance to cover our advice and the recommendations provided by your adviser. Hillross is also covered by professional indemnity insurance and this satisfies the requirements imposed by the Corporations Act 2001 and National Consumer Credit Protection Act. The insurance covers claims arising from the actions of former employees or representatives of Hillross, even where subsequent to these actions they have ceased to be employed by or act for Hillross.

Your privacy

Your privacy is important to us. Below we outline how we maintain the privacy of the information we collect about you.

Privacy Collection Statement

As part of the financial planning process, we need to collect information about you. Where possible we will obtain that information directly from you, but if authorised by you we may also obtain it from other sources such as your employer or accountant. If that information is incomplete or inaccurate, this could affect our ability to fully or properly analyse your needs, objectives and financial situation, so our recommendations may not be completely appropriate or suitable for you.

We are also required under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006 to implement client identification processes. We will need you to present identification documents such as passports and driver's licences in order to meet our obligations.

We keep your personal information confidential, and only use it in accordance with our Privacy Policy. Some of the ways we may use this information are set out below:

- Your adviser and Hillross may have access to this information when providing financial advice or services to you;
- Your adviser may, in the future, disclose information to other financial advisers, brokers and those who are authorised by Hillross to review customers' needs and circumstances from time to time, including other companies within the AMP group;
- Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial or other services to assist your adviser and the AMP group in providing financial advice and services to you. A list of countries where these service providers are located can be found in the AMP Privacy Policy.
- Your information may be used to provide ongoing information about opportunities that may be useful or relevant to your financial needs through direct marketing (subject to your ability to opt-out as set out in the AMP Privacy Policy);
- Your information may be disclosed as required or authorised by law and to anyone authorised by you.

Your adviser and Hillross will continue to take reasonable steps to protect your information from misuse, loss, and unauthorised access, modification or improper disclosure. You can request access to the information your adviser or Hillross holds about you at any time to correct or update it as set out in the AMP Privacy Policy. The AMP Privacy Policy also contains information about how to make a complaint about a breach of the Australian Privacy Principles.

For a copy of AMP's Privacy Policy visit <http://www.amp.com.au/privacy> or you can contact us.

Our services for Managed Discretionary Accounts

We offer limited types of Managed Discretionary Account services (MDA services) within approved investment platforms. Through these services, you allow us to manage your investments for you, using our discretion and without obtaining your instructions before each transaction we undertake on your behalf. However, we do not (and we are not authorised to) open new accounts, withdraw funds or contribute funds to your investment.

What are the risks associated with using the MDA service?

By authorising us to make changes to your investments, you cannot claim we were not acting on your behalf if we acted within the authority given. Therefore, our acts bind you. It is important you understand what we are authorised to do and that you carefully read and understand the activities that you are authorising us to do on your behalf.

How can you instruct us to exercise rights relating to the financial products in your portfolio?

Generally, the financial products that we invest in on your behalf do not have any additional rights or entitlements attached to them. However, if there are, we will let you know. You can then instruct us how you wish us to proceed.

Do you have to enter into a contract for us to provide MDA services?

Yes. This MDA contract will set out the terms and conditions of the authority and also the investment program, which sets out how your money will be invested. We will agree and prepare the investment program for you based on your relevant personal circumstances, your financial objectives and your needs and review the program every 12 months.

Will the investment program in the MDA contract comply with the law?

If this is relevant, then the investment program set out in the MDA contract will comply with the law. The relevant law is Division 3 of Part 7.7 of the Corporations Act. The contract will also contain:

- statements about the nature and scope of the discretions we will be authorised and required to exercise under the MDA contract
- any investment strategy that is to be applied in exercising those discretions
- information about any significant risks associated with the MDA contract
- the basis on which we consider the MDA contract to be suitable for you, and
- warnings that the MDA contract may not be suitable to you if you have provided us with limited or inaccurate information. It will also specify that the MDA service may cease to be suitable for you if your relevant personal circumstances change.

Do we provide custodial or depository services for your portfolio?

We do not provide custodial or depository services. This means that you will either hold the investments in the portfolio, or the custodian nominated for that financial product will hold them.

This financial services guide complies with the ASIC Class Order 04/194.

Our Financial Advisers and Credit Advisers

About Michael Schnabel



I enjoy my work and love seeing my clients achieve their goals.

Experience	Michael has been a Financial Planner since 1990. He has completed the Diploma of Financial Planning and has been awarded with the CFP (Certified Financial Planner) recognition in 1997. Michael has also completed the Advanced Marketing Certificate through TAFE. In addition to these, Michael has completed the Cavendish SMSF course and The Aged Care Steps, Aged Care Accreditation. Michael continues to update his knowledge with over 40 hours worth of continued study each year. Michael has an extensive knowledge of all aspects of Financial Planning obtained since starting in the industry in 1990.
Qualifications	CFP JP
Memberships	Financial Planning Association
Phone	02 95482326
Email	michael.schnabel@hillross.com.au
Authorised representative number	247605
Credit representative number	368701

The advice and services I can provide

I am authorised to provide all the services listed in the **Our advice and services** section.

How I am paid

I receive the following from our firm:

- salary

Michael Schnabel is an employee, director and shareholder of Sanctuary Financial Services Pty Ltd and receives a salary.

Schedule of fees

These prices should be used as a guide only. We will discuss your individual needs and agree our fees with you. The actual agreed fees will depend on factors such as the complexity of your circumstances and goals and the scope of the advice.

Initial service fees

These are fees paid when you have agreed to receive our advice:

Initial service	Fee amount
Statement of Advice preparation (any entry fees to funds fully rebated)	Starting from \$2,200.00
Hourly rate for complex strategies	\$330.00
Placement fee	Starting from \$440.00
Fees for insurance advice	Starting from \$660.00
Aged care advice	Starting from \$2200.00
SMSF	Starting from \$3300.00

Ongoing service fees

We provide ongoing services to help you stay on track to meet your goals. The cost of these services are as follows:

Ongoing service	Fee amount
Bronze Package - yearly review refer to client value proposition for a description of package features and fees	\$1,650.00
Silver Package - twice yearly review refer to client value proposition for a description of package features and fees	\$3,300.00
Gold Package - quarterly review refer to client value proposition for a description of package features and fees	\$6,600.00

Commissions

I do not receive commissions on investments through new superannuation, managed funds or retirement products. However, some products, particularly older products, may attract commissions.

Any commission amounts will be disclosed to you when providing my advice. The following table is a guide of commissions I may receive.

Product type	Initial commission	Ongoing commission	Example
Investments	Up to 4.95% of all contributions made to the investment.	Up to 0.7% of the investment value each year.	If you made an investment of \$10,000, we would receive up to \$495.00 initially and \$70.00 pa.
Insurance (including those held within	Up to 130% of the first year's premium.	Up to 33% of the premium each following	If your insurance premium was \$1,000, we would

superannuation)

year.

receive up to
\$1,300.00 initially
and \$330.00 pa.

All fees and charges include GST.

If an agreed advice fee is charged then we may rebate all or some of the commission.