

FINANCIAL SERVICES GUIDE

Issue Date

The Financial Service Guide (FSG) is dated 18th February 2019 and replace all previous versions. LaVerne Capital Pty Ltd authorises the distribution of this FSG.

The financial services referred to in this guide are offered by:

LaVerne Capital Pty Ltd

ABN	: 20 609 554 485
AFSL No.	: 482937
Principal Business Address	: 7/104-108 Wigram Street, Harris Park NSW 2150
Phone	: 0425 308 313
Email	: vijay.raj@lavernecapital.com.au

LaVerne Capital Pty Ltd is recognized to provide financial planning services that are truly in the best interests of our clients.

This guide contains important information about:

1. The financial services we offer so you can make an informed decision whether to use those services.
2. Information we need from you.
3. The cost of our advisory services and how we pay our representatives.
4. What to do if you have a complaint about our services.
5. How you can contact us

When we give you financial advice - 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:

- Our fees and commissions
- Any associations we have with financial product issuers or other parties which may have influenced the advice we give you.

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.

About Us

LaVerne Capital Pty Ltd (ACN 609 554 485) (“Laverne Capital”, “we”, “our”, or “us”) is a financial planning and investment advisory firm specializing in listed securities and managed investment scheme. Our advisors’ record of achievements and reliability is based on providing some of the best investment advice and service in Australia. We offer extensive skills which mirror the different needs of clients with great emphasis placed on research and quality service to support the advice and the financial product provided.

LaVerne Capital Pty Ltd holds an Australian Financial Services License (AFSL 482937) and is authorised to provide financial services under this license.

Collectively we can provide financial product advice, arrange and deal in the financial product truncations covering:

- Deposit & Payment Products
- Government Debentures, Stocks or Bonds
- Life Products
- Managed Investment Schemes
- Retirement Saving Account Products
- Securities
- Superannuation

General Advice

At times LaVerne Capital Pty Ltd may only offer you general financial product advice, including where Authorised Representatives are only authorised to give General Financial Product Advice. You should note that general financial advice does not relate specifically to you and therefore may not be appropriate to your particular financial needs, objectives, financial circumstances and best interests. You need to take this into account before deciding whether or not to act on this advice.

Personal Financial Advice

LaVerne Capital Pty Ltd recommends that you should always seek the advice of a qualified Financial Adviser. If our Financial Advisers provide you with personal financial advice your initial discussions with a Financial Adviser should be treated as a Fact Find and you may be required to complete a questionnaire that includes personal information. (* Privacy Policy) This is important as every situation is unique to the individual and the advice you receive should be tailored to your specific needs and at all times be in your best interest.

This information will allow your planner to prepare a Statement of Advice (“SoA”) which you will receive at the time or as soon as is practical after the advice is given. This statement will set out the advice, the basis on which the advice was given and any remuneration or other benefit that we, including your financial adviser and associates, may receive. We will also include details of any matter that might reasonably be expected to be capable of influencing us in providing this advice.

If you maintain a personal advice relationship with us, then generally we will not provide a SoA for further advice situations unless there have been significant changes to either your personal circumstances or the basis of the advice since your last SoA was provided. In these circumstances however, we are still required to keep a Record of Advice (“RoA”). You have the right to request a copy of the RoA at any time.

You will receive an annual statement disclosing any ongoing fees that you have paid along with the services provided to you, this is called our Fee Disclosure Statement. This is an ideal time to discuss the fees you are paying with your adviser, of course this can be done at any time.

You will also receive a renewal notice every 2 years seeking your consent to continue to provide the financial product service to you (this is the Opt-in requirement) where ongoing fees are involved.

About my adviser

Your adviser **VIJAY RAJ** acts on behalf of **LaVerne Capital Pty Ltd** who is authorised representative of the holder of Australian Financial Services License (**AFSL 482 937**). Under the Corporations Act, our primary responsibility is to you, our client.

Your adviser can provide a wide range of services from strategic advice, to investment advice, to advice on a wide range of insurance products such as life, trauma and income protection. Further details of your adviser’s background along with the payments we receive are as per the profile which forms part of this FSG.

Who is responsible for the financial services provided?

LaVerne Capital Pty Ltd is responsible for the financial services provided including the distribution of this FSG.

Do any relationships or associations exist which might influence you in providing me with the financial service?

LaVerne Capital Pty Ltd is not controlled by any financial institution/s such as a fund manager, bank, insurance company or trade/credit union. None of these institutions has a vested interest in our business and are not therefore in a position to influence us in the provision of advice.

What kinds of Financial Products I am authorised to advice and deal in?

- Deposit and payment products
- Debentures, stocks or bonds
- Investment life insurance products
- Life risk insurance products
- Managed investments schemes
- Securities
- Superannuation

What information we need from you.

We expect that you will provide us with accurate information that we request including your personal objectives, details of your current financial situation and any other relevant information, so that we have a reasonable basis on which to provide you with advice.

We expect that you will use our advice to enable you to make informed financial decisions.

AML/CTF

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's license. We will also retain copies of this information. We assure you that this information will be held securely.

What are the possible consequences of not providing this information?

You are of course at liberty to decline to provide some or all of this information, but if you do not provide it, any recommendations we make may not be appropriate to your needs and objectives. In certain cases, your failure to provide information may place us in a position where we cannot provide any advice or any financial services to you.

How can I give you instructions about my Financial Products?

You may tell us how you would like to give us instruction. For example by telephone, fax or other means such as e-mail.

If we provide you with execution related telephone advice, you may request a record of the execution related telephone advice, at that time or up to 90 days after providing the advice.

How will I pay for the service and what remuneration, commission, fees or other benefits do you receive in relation to providing that financial service to me and how are they calculated?

LaVerne Capital Pty Ltd advisors are remunerated through the fees and commissions that you are charged. To assist you in making an informed decision, your advisor will discuss with you and agree on any fees payable before providing a service. The Corporations Act requires us to fully disclose all fees and charges, so if you are in doubt please ask us to explain. You may be charged a fee for the services we provide or we may be paid a commission or brokerage or a combination of the two may apply.

All fees and commissions are payable to the Licensee (LaVerne Capital) which will be as per the schedule contained in the adviser profile. Details of the fees and commission for each product are

contained in the Product Disclosure Statements (PDS) that your advisor will provide. Your advisor will also provide full details of fees and commissions in your Statement of Advice.

Please note that your advisor will receive all fees or commissions received.

Alternative remuneration (Non-monetary benefits)

From time to time advisors may receive non-monetary benefits from product providers. This can range from small benefits such as movie or sporting event tickets to more valuable benefits such as sponsorship to attended conferences.

If the value of any of these benefits exceeds \$300 it will be recorded in the Alternative Remuneration Register. A register will be maintained by **LaVerne Capital Pty Ltd** for any benefits received by them that exceed \$300, and each individual advisor will maintain a register for any benefits that they receive directly and are valued at more than \$300

A copy of the register will be available for inspection on request.

Will you give me advice that is suitable to my investment needs and financial circumstances?

Yes

What information do you maintain you maintain in my file and can I examine my file?

We need to hold all information you give us for a period of 7 years. Yes you can view information held by making a request.

What kinds of compensation arrangements are in place and are these arrangements compliant?

It should be noted that **LaVerne Capital Pty Ltd** has Professional Indemnity Insurance in place to cover us for the financial services that we provide. We understand that it is adequate to meet our requirements as a financial services licensee. The policy includes coverage for claims made in relation to the conduct of representatives/employees who no longer work for us (but who did at the time of the relevant conduct)

What should I know about any risks of the financial products or strategies you recommend to me?

We will explain to you any significant risks of financial products and strategies, which we recommend to you. If we do not do so, you should ask us to explain the risks to you.

We are committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information. A copy of our privacy policy is enclosed for your information.

What should I do if I have a complaint?

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms for our clients. If you have any complaint about the service provided to you, you should take the following steps:

1. Contact your advisor immediately and educate your advisor about your complaint. Most of disputes are been resolved this way.
2. If your complaint is not satisfactorily resolved within 7 days please contact **VIJAY RAJ** and put it in writing to **VIJAY RAJ** at **Address:** 7/104-108 Wigram Street, Harris Park NSW 2150 or via call on **Phone No:** 0425 308 313 or by sending an email at **Email Id:** vijay.raj@lavernecapital.com.au
3. If we cannot reach a satisfactory resolution within a further 45 days you can send your complaint to AFCA – Association Financial Complaints Authorities on their free call number is 1800 931 678. 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.

Professional Indemnity Insurance

LaVerne Capital Pty Ltd confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). In particular our Professional Indemnity insurance, subject to its terms and conditions, provides professional indemnity for LaVerne Capital Pty Ltd and our authorised representatives / financial advisers / employees in respect of our authorisation and obligations under our Australian Financial Services License (**AFSL 482937**). The insurance will continue to provide such coverage for any authorised representative / financial adviser / employee who may have ceased, for work done whilst engaged with us.

Adviser Profile

VIJAY RAJ

LaVerne Capital Pty Ltd

ABN : 20 609 554 485
AFSL No. : 482 937
Address : 7/104-108 Wigram Street, Harris Park NSW 2150
Postal Address : P.O.Box 9073 Harris Park NSW 2150
Mob : 0425 308 313
Email : vijay.raj@lavernecapital.com.au

Relevant Education and Qualification

I am a Seasoned Financial Planner and working in the industry for more than 15 years and as a Financial Planner or Financial Advisor from 2007.

I have following Qualifications and Associations that can give you a Snap Shot above my Credentials

- Bachelor of Engineering –Mechanical
- Masters of Business Administration
- Masters in Commerce-Sydney University
- Diploma and Advanced Diploma in Financial Planning
- Tier 1-Insurance Broking –General Insurance
- Diploma in Mortgage Broking

Being a Professional and a Delegate at Various Seminars and Conferences

- Financial Planning Association
- Mortgage and Finance Association of Australian
- Self-Managed Super Fund Association
- National Insurance Brokers Association
- Stock Brokers Association

I am authorised by **LaVerne Capital Pty Ltd** to offer you the following services:

Provide financial product advice and to deal in a financial product by arranging for a financial product to be acquired, varied or disposed of in respect of the following financial products:

LaVerne Capital Authorisation

- Deposit and payment products
- Debentures, stocks or bonds
- Investment life insurance products
- Life risk insurance products
- Managed investments schemes
- Retirement savings accounts Standard margin lending facility
- Superannuation

How are we paid?

We offer clients a selected range of payment options. We may be paid by one or more of the following methods outlined below. A combination of fee for service and commission from a product or service provider may be payable. This will be disclosed to you at the time we provide you with advice.

Insurance Products: Hybrid Commission will be payable to your adviser as per the following

Product Type	Upfront Commission	Ongoing Commission per annum
Life Risk Insurance Products	Up to 77% of the first year's Premium.	Up to 22% of that year's Premium.

Dollar examples of fees:

Product Type	Upfront Adviser Service Fee (inclusive of GST)	Ongoing Adviser Service Fee per annum (inclusive of GST)
Life Risk Insurance Products. Based on \$1000 premium	Up to \$770	Up to \$220

We can take an example of level Commission will be payable to you as per the following

Product Type	Upfront Commission	Ongoing Commission per annum
Life Risk Insurance Products	30% to 35% of the first year's Premium.	30% to 35% of that year's Premium.

Dollar examples of fees:

Product Type	Upfront Adviser Service Fee (inclusive of GST)	Ongoing Adviser Service Fee per annum (inclusive of GST)
Life Risk Insurance Products. Based on \$1000 premium	Up to \$300 to \$350	Up to \$300 to \$350

Commission Clawback Structure:

Commission Clawback	Hybrid*	Level
Within 0-12 Month	100%	Sliding Scale based on Premiums Paid (Same Approach Pre and Post LIF)
Within 13-24 Month	60%	No Clawback Applies
24 Months Onwards*	No Clawback applies*	No Clawback applies*

- Commission will be reversed if a Premium On which Commission has been paid is refunded to the client.
- In rare Instances, there may be 36months responsibility Period. In that case, Months 25 to 36 will also be subject to a 60% claw back.

Examples of events which do not trigger any claw back include:

- A claim is being paid
- The life insured reaches benefit expiry age
- A discounts ends or a new premium discount is applied
- There is a change in premium due to a reduction in risk (e.g. customer gives up smoking)

Financial Plan Preparation Fee-Initial Advice Fees

We may agree to charge you a fee, depending on the time we spend developing your plan and the value of funds you invest. If you choose to pay a fee we can agree to rebate to you any initial commission we would otherwise receive.

Our minimum fee for the preparation of a Statement of Advice containing insurance recommendations only is \$990 inclusive of GST. If you take action in accordance with the recommendations contained in the Statement of Advice, and purchase the relevant insurance products pertaining to your needs, no fee will be payable, as we will be paid commission by the relevant insurance company, We may invoice you for a fee when you receive our written recommendations.

Managed Investment Products

We do not accept commissions/fees from managed investment providers as our time and expertise is covered by an ongoing fee based on the value of the funds you invest and the financial products you use. This fee can be asset based and paid directly from your investment portfolio. Alternatively, it may be a direct debit payment from your bank account or invoiced to you, depending on the arrangement you have agreed upon with your adviser.

** All fees and charges will be clearly disclosed to you in writing by your advisor at the time the advice is provided in your Statement of Advice. **

What fees will you pay for the services we provide?

Fees that may be applicable for the preparation of your advice are:

- Advice Fees: Range from \$0 - \$5500 (inclusive of GST)
- Implementation Fees: Range from \$0 - \$5500 (inclusive of GST)
- Ongoing Adviser Service Fee: Range from 0% or \$0 – 2.2% or 0 - \$2200 for funds under advice (inclusive of GST)
- Review Fees: Range from \$0 - \$2200 (inclusive of GST)
- Hourly Rate: \$330 per hour (inclusive of GST)
- No Advice/Execution/Instruction Fee: Range from \$0 - \$1650 (inclusive of GST)
- Claims Assistance: Range from \$0 - \$2200 (inclusive of GST)

If however, you decide not to proceed with the recommendations outlined in the Statement of Advice or if you cancel your policies within the first 12 months, depending on the complexity of the recommendations provided to you, an invoice for fees of between \$250 inclusive GST and an amount equivalent to your total first years premium, inclusive of GST, will be issued to you by our Australian Financial Services Licensee (**AFSL 482937**) LaVerne Capital Pty Ltd and payment will be required within 28 days of the date of the invoice. This is necessary to cover the cost of the service we have provided. If you do not implement our advice the product provider does not pay us, also if you do not retain the recommended cover for a minimum period of 12 months the payments made to us for our services are written back by the product provider.

We are committed to making sure our fees are transparent, understood and agreed to by you. Our preferred method of payment is by an agreed fee.

The actual fee charged to you will depend on the nature of the advice or service we provide. We will discuss and agree the actual fees with you before we proceed.

Privacy Act

Privacy Policy Statement

LaVerne Capital Pty Ltd

ABN 20 609 554 485 AFSL No. 482 937
Suite 7/104 Wigram Street, Harris Park NSW 2150
P.O. Box 9073, Harris Park NSW 2150
Phone: 02 8859 2577
Fax: 02 8246 6353
Website: www.lavernecapital.com.au

“LaVerne Capital Pty Ltd” abides by the Australian Privacy Principles (APPs) which is a part of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

1. INFORMATION WE COLLECT

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/ or contains information or an opinion about you (“personal information”). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, estate planning and superannuation;
- Details of your investment preferences and aversion or tolerance to risk;
- Information about your circumstances, family commitments and social security eligibility.

2. CONSEQUENCES OF NOT PROVIDING INFORMATION

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you. We are required pursuant to the Corporations Act to collect sufficient information to ensure appropriate advice can be given in

Respect of recommendations made to our clients. If you elect not to provide us with the personal information referred to above; we may elect to withdraw our services if we believe we are unable to provide you with a complete service.

3. OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

We are committed to being open and transparent about how we use personal information. Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed. If any of our documents do not clearly state the purposes for which we will use your personal information please ask us and we will clearly explain them to you.

We will not use your personal information for any purpose other than for which it was originally collected, unless you have given us your consent to do so, or unless it is reasonably expected that we will use the information for another purpose (a secondary purpose). An example of a secondary purpose is providing information in a court of law or dispute resolution.

Should we receive personal information that we have not asked for, we will establish whether the information could have been assessable and contained in a Commonwealth record and if the collection of this personal information was reasonably necessary or directly related to our service. Should the above not apply, we will as soon as practicable destroy the information.

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your financial products or services, reviewing your ongoing needs, enhancing customer service and product options and giving your ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

If, at any time, you do not wish to receive this information, you may contact us with this request. We will endeavor to meet your request within 2 weeks. We maintain a register for those individuals not wanting direct marketing material. Please refer to the end of this document for our contact details.

LaVerne Capital takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas. As part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. We will obtain your consent prior to doing so.

4. INFORMATION COLLECTION POLICY

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally, collection of your personal information will be effected in either face to face interview, over the telephone or by way of an online client engagement form. From time to time additional and/ or updated personal information may be collected through one or more of these methods. We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- The preparation of your financial plan;
- The provision of financial planning advice to you;
- Making securities and investment recommendations;
- Reviewing your financial plan; reviewing securities and investment recommendations;
- Lodging or redeeming investments.

5. INFORMATION DISCLOSURE

We will not use or disclose personal information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure;
- Where you have consented to such disclosure;
- Where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the commendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information will be made available to other advisers or employees of LaVerne Capital. It is a condition of our agreement with each of our advisers that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any adviser or employee of LaVerne Capital in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

We may disclose your personal information to external contractors for the following purposes:

- Storing information
- Audit of company accounts
- Compliance framework review

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. We will confirm with external contractors that they have systems and procedures for handling personal information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below. We will advise you of any change in business circumstances that may affect the handling of your personal information.

6. STORAGE OF PERSONAL INFORMATION

Your personal information is generally held in your client file. Information may also be held in a computer database. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All record movements off premises are recorded in a central register. After-hours access to our premises is controlled by allowing only personnel with security passes to access the premises. All computer-based information is protected through the use of access passwords on each computer. Data is backed up and stored securely off site. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off-site storage facility, and destroyed after an appropriate period of time that complies with legislative and professional requirements (usually 7- 10 years).

7. ACCESS TO YOUR PERSONAL INFORMATION

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result. We will not provide you with access to your personal information if:

- Providing access would pose a serious threat to the life or health of a person;
- Providing access would have an unreasonable impact on the privacy of others;
- The request for access is frivolous or vexatious;
- The information related to existing or anticipated legal proceedings between us, and would not be discoverable in those proceedings;
- Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- Providing access would be unlawful
- Denying access is required, or authorised by or under law
- Providing access would be likely to prejudice certain operations by, or on behalf of an enforcement body, or an enforcement body requests that access not be provided on the grounds of national security. We will endeavor to respond to any request for access within 14 to 30 days depending on the complexity of the information and/ or the request. If your request is urgent please indicate this clearly. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

8. CORRECTION OF PERSONAL INFORMATION

We will endeavor to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

9. COMPLAINTS

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavors to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

10. ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at www.privacy.gov.au.

11. ADDITIONAL PRIVACY DISCLOSURE - OUR BUSINESS PARTNERS

In order to keep our costs competitive your adviser utilizes specialist business support resources that are located in the following countries: India

The organisation 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.

12. CONTACT DETAILS

If you have query relating to our privacy practices please contact us at:

Compliance Coordinator
LaVerne Capital Pty Ltd
Suite 7/104 Wigram Street
Harris Park NSW 2150