



Financial Services Guide

Our guide to assisting you with your financial needs

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Spinell Financial Services Pty Ltd (**Spinell Financial Services'**)

ABN 63 136 567 738 | Corporate Authorised Representative no 408313

of

Financial Adviser Network Pty Ltd (**Financial Adviser Network'**)

ABN 71 633 144 242 | Australian Financial Services Licence no 517061

Authorised for distribution by Financial Adviser Network. References to "we", "us" or "our" refer to Financial Adviser Network Pty Ltd as the Australian Financial Services Licensee, and references to "Adviser" mean authorised representatives of Financial Adviser Network.

Let us guide you

The purpose of this Financial Services Guide (FSG) is to help you make an informed decision about the services we offer and whether they are appropriate to your needs. This FSG provides you with important information you should know before engaging your Adviser.

This FSG covers the following:

- Information about Financial Adviser Network as the licensee
- Who is responsible for providing financial services to you
- The financial services and products we are authorised to provide
- Your Adviser
- The types of documents you may receive
- How your Adviser and Financial Adviser Network are remunerated
- Any other benefits or associations that may influence the advice provided
- How you can provide instructions to your Adviser
- How to access our Privacy Policy, including details of how we collect, hold and disclose your personal information
- Our complaints handling process and compensation arrangements

Not independent

Financial Adviser Network and its Authorised Representatives receive insurance commission and therefore are not independent, impartial and or unbiased.

Who we are and what we stand for

As an Australian Financial Services (AFS) Licence holder, Financial Adviser Network is a privately owned company.

At Financial Adviser Network, our mission is to deliver high-quality, reliable advice that reduces uncertainty and helps you make confident decisions, so you are better positioned to achieve your goals and objectives.

Our responsibility

Your Adviser provides financial advice and services on behalf of Financial Adviser Network and accordingly we are responsible for the financial advice and services they provide.

Your Adviser is committed to providing high-quality financial advice, considering products and or services that are suitable for your individual circumstances.

Your Adviser is obliged by law to act in your best interests and provide appropriate advice, when providing you with financial advice and services.

As part of our commitment to you, our Advisers adhere to the Financial Planners and Adviser's Codes of Ethics and the Professional Code of the Financial Advice Association of Australia (FAAA).

Our advice and services offering

Financial Adviser Network provides general and personal advice in the following areas:

- **Strategic financial planning**
- **Retirement planning**
- **Superannuation strategies**
- **Pensions advice**
- **Wealth creation strategies**
- **Debt and cash flow management**
- **Tax effective strategies**

- **Estate planning considerations**
- **Centrelink, age pension and senior health care card assistance**

We are authorised to advise and deal in the following products:

- **Basic deposit products**
- **Debentures, stocks and bonds**
- **Life insurance risk and investment products***
- **Managed investments**
- **Investor Directed Portfolio Services (IDPS)**
- **Retirement Savings Accounts (RSA)**
- **Securities***
- **Superannuation**
- **Self-managed superannuation**

With respect to direct Australian listed securities and exchange traded securities and risk insurance, whilst we are licensed to advise on these, we generally will not provide personal advice but instead refer you to a specialist.

We consider a broad range of financial products offered by leading product providers. We generally only recommend products we have researched, our Approved Products List (APL).

We will assess the suitability of you continuing to hold any existing financial products and consider any specific product requests you may have within our scope.

Financial Adviser Network is not authorised to provide margin lending advice.

For direct securities and risk insurance matters, we will refer you to an appropriately qualified specialist, such as a stockbroker or risk insurance adviser, as we believe specialist advice is necessary.

Where your Adviser needs to consider products outside of their APL, your Adviser may apply to Financial Adviser Network's Research Committee to obtain a one-off product approval.

Specialist advice and referrals

Financial Adviser Network is not authorised to provide the following specialist services under its Australian Financial Services Licence. However, we may refer you to external specialists where appropriate.

Some of these specialist services we may be able to refer you to include:

- **Accounting, audit and taxation services**, such as the completion of tax returns and the provision of tax advice.
- **Legal and or consulting services**
- **Estate planning professionals** such as a solicitor
- **Real estate and direct property**
- **Specialist investment products** - Tax-effective Schemes (e.g. agricultural schemes), margin lending, structured products and derivatives
- **Administration and compliance of Self-Managed Superannuation Funds**
 - **General insurance**
 - **Credit product advice such as mortgage or finance broking**

Advice areas, we believe our clients are best served by specialists:

- **Personal protection and risk insurances and upfront, ongoing advice and claims handling services in relation to life, TPD, trauma and income protection insurances.**
- **Stockbroking**
- **Aged care planning**

You should understand that these other services are not provided under Financial Adviser Network's Australian Financial Services Licence, and we cannot accept responsibility in relation to any advice

or services provided by a third party. Where we provide a referral to unrelated companies, we cannot endorse or recommend, nor are we responsible, for the products or services that you may receive from them.

Your Adviser – Patrick Klemke

Patrick has nearly 28 years of experience in the financial services industry. Beginning his career as an Accountant, he transitioned into financial planning and has been advising clients since 2011.

With over 15 years of financial planning experience, Patrick specialises in helping clients achieve their financial goals through personalised advice and strategic planning. In 2020, he became the holder of his own Australian Financial Services Licence, reflecting his dedication to delivering high-quality, objective financial advice.

Patrick previously operated long standing reputable accounting and financial planning practice in Geelong. He recently sold his accounting business to focus on his true passion for financial planning and supporting clients. Patrick has the following qualifications and professional designations:

- **Bachelor of Commerce (Accounting and Commercial Law)**
- **Diploma of Business**
- **Certified Practising Accountant (CPA)**
- **Associate Diploma in Business (Accounting)**
- **Certificate in Self-Managed Superannuation Funds**
- **Accredited Listed Product Adviser Program**

Patrick no longer provides accounting or tax agent services; Patrick instead is authorised to provide tax (financial) advice services, which means he can explain the taxation implications of your financial advice, and you should confirm your own taxation position with your accountant or tax agent.

Providing us with your information

Where you decide to obtain personal financial advice, your Adviser will need to determine your needs, objectives and relevant financial circumstances.

At the initial advice appointment, your Adviser will typically gather the relevant information by using a client data collection form. You will be asked to provide accurate information about your personal and financial situation and keep your Adviser informed of any changes to your relevant circumstances to ensure they formulate your appropriate advice.

Your Adviser will also need to verify your identity. Further information is provided in the 'Your privacy' section.

You have the right not to tell us things or give us certain information, if you do not wish to. However, if you do, we may not be able to provide appropriate advice. When receiving limited advice, you may need to personally consider the appropriateness given your full personal objectives and financial circumstances before proceeding. You should read the warnings contained in our advice documents carefully before making any decision relating to any financial products.

Documents you may receive

When your Adviser provides personal financial advice to you, you may receive one or more of the following documents:

- **Letter of Engagement**
- **Statement of Advice (SoA)**
- **Record of Advice (RoA)**
- **Product Disclosure Statement (PDS)**
- **Ongoing Service Agreement (OSA)**

SoA will set out the advice that has been tailored to your specific circumstances and provide you with details of all relevant disclosures including details of any remuneration payable.

A PDS will be provided if a product recommendation is made and includes important information you should read about the financial product including features, benefits, conditions, costs and cooling off rights (if applicable).

There are other circumstances where a SoA is not necessary, and you may receive other documents:

General advice — provided in seminars and through newsletters, which does not consider your personal circumstances.

Factual information — about your investments, or financial assets, such as valuations, performance figures and progress reports.

Further advice — if you previously received advice in a SoA, we may record any further personal advice in a Record of Advice (RoA). Where your advice needs become more complex, or if there's been a significant change in your circumstances, we may need to prepare a new SoA. Any changes to your engagement and its costs will always be pre-agreed with you.

If for any reason we do not provide you with your own copy of the RoA, you may request a copy of a RoA by contacting us and this opportunity is available for a period of seven years from the date further advice was first provided to you.

Ongoing Services — If you agree to our ongoing services, we will ask you to confirm annually on the anniversary of your agreement that you wish to continue with your Ongoing Service Agreement, by signing an annual renewal notice. In addition, we will require the annual signing of a product provider fee consent form, where your ongoing service fees are being deducted directly from your account(s).

Under law, failure to provide your annual consent to the Ongoing Service Agreement within the prescribed period of 150 days of the anniversary date will terminate the agreement. At such time, we will be unable to provide you with advice and services until you have re-signed a new Ongoing Service Agreement.

You may request in writing a copy of any advice document up to seven (7) years after the advice has been given.

We will provide all required financial services disclosure documents electronically. We will alert you to any electronic disclosure documents via email, providing clear access instructions to a direct link, attached disclosure document or sending you electronic documents through Docusign. We recommend you download, save or print these documents for your own future reference. You can at any time request a paper copy at no cost, change your communication preferences and or opt out of electronic disclosure documents at any time.

How to provide us your instructions

We will reasonably endeavor to execute your instructions in a timely manner. If there is an urgency to any instruction, please note the following and clearly note this when communicating this to us.

For security purposes, we will seek to verify that instructions we receive are genuine before acting on them. This process and time taken to contact you or delays caused by third parties or postal services, may

occasionally increase the time it takes to act on your instructions. As such we are responsible for any losses that result from delays outside our control.

Our services may include “no advice execution only services” where we act on your instructions. We will only be able to undertake these execution only services in compliance with the law, or the product providers’ distribution guidelines.

Execution or transaction only Instructions

Where you do not require advice from us but request assistance to execute a particular transaction or acquire a financial product, we may be able to do so on an execution only basis. This is subject to the product being within the scope of our authorisations and not restricted by your platform or the relevant product provider, including under applicable design and distribution obligations. If we are unable to assist you for any reason, we will notify you accordingly.

In a situation where we can assist, we may require:

- a written instruction from you or confirmation of your verbal instruction in writing.
- a signed acknowledgement confirming your instructions and acknowledging the risks of proceeding without receiving personal advice from us.

Once all requirements have been obtained, we may arrange for the transaction to be completed.

Advice and service costs

Depending on your initial, implementation, ongoing advice and review needs, the cost of our professional services is quoted based on a flat dollar cost.

Our fixed dollar fees are determined according to the scope of advice, complexity of your circumstances, the time and resources required to provide the services, and the level of assets we are responsible for managing. As a result, fees may differ between clients to reflect differences in the scale and complexity of the advice provided, the ongoing service requirements, and the costs associated with delivering those services.

In your Statement of Advice (SoA), Letter of Engagement, or Ongoing Service Agreement (OSA) we will detail the services we believe are appropriate and of benefit to you given your specific objectives and financial situation along with the relevant service costs.

Our costs are quoted in distinct stages, initial, implementation and ongoing advice services.

Our advice and service costs

All costs are quoted inclusive of GST and agreed prior to commencing any work.

Initial advice

We charge a flat fee for service for initial consultation, strategy development, preparation of advice and implementation. This cost is established based on the scope, complexity and time involved. The minimum fee for our initial advice services starts at \$1,650, however could range to \$11,000.

Implementation costs

We typically charge a flat fee for service for the implementation of our advice based on the scope, complexity and time involved. The minimum fee for implementation starts at \$500, however, could range up to \$1,650.

Ongoing advice and services costs

Typically, a minimum fee for our ongoing advice and services is \$2,200, however could also range up to \$11,000.

As the law prohibits asset-based fees on portfolios subject to borrowed funds, we will instead agree to a flat dollar cost in these circumstances.

Professional service costs

Our professional service rates per hour range are based on the expertise and seniority of personnel.

Financial Adviser \$440 per hour

Administrator \$220 per hour

Any execution only, no advice transactions are charged at fee for service rates based on the time and personnel required.

Securities

If our services include the implementation of either buying or selling listed securities, our administrative cost is calculated as an asset-based fee of 0.88% of the trade value, subject to a minimum of \$110 in addition to the brokerage payable through the trading platform.

Commission and other benefits disclosure

As we no longer advise on risk insurance products, we typically do not receive any new upfront and ongoing commissions.

We may continue to receive commission on existing insurance policies where we previously provided risk insurance and product advice. This commission continues to be paid quarterly by the product provider. If your premium was \$500 per annum and the trail commission was 22%, we would be paid \$110 for each year you held the policy.

Please note that the receipt of ongoing commission by us does not include an entitlement to ongoing services. Where you need a review of your insurance arrangements, we will now refer you to a specialist.

Where you make a change to any of your existing insurance products, which results in the sale of additional cover, with your upfront consent we may receive commissions on existing life insurance products. The maximum initial payment may be up to a maximum of 140% of the total premium.

We also receive ongoing commissions on existing insurance policies which may be up to 22% per annum of the total premium. the issuer of the product as part of the cost of distribution.

When undertaking any instructions that may change the commissions we receive, we will disclose all details of any benefits or commissions received by us, or another person receives in writing to you.

Payment of fees

When we send you an invoice (e.g. for preparation of a Statement of Advice), you can select any of the methods of payment detailed on the invoice that is most suitable to you. Please note we are prohibited from receiving cash. Alternatively, with your signed consent and where appropriate, you can choose to have fees deducted from your investment or superannuation account by the platform/ administration provider.

Remuneration

We are typically remunerated by fees charged at a fixed rate for our advice and services and ongoing commission paid to us by insurance product providers for existing clients who hold personal protection insurance.

All fees or commissions are initially paid to Financial Adviser Network before being distributed in full to the relevant practice and their Adviser(s). The relevant practice pays a service fee back to Financial Adviser Network for its licensee services, which include services such

providing as professional indemnity, product research and compliance services.

Other forms of remuneration or benefits

Financial Adviser Network and/or its Advisers may receive non-monetary benefits of an immaterial nature where:

- The amount is less than \$300 and identical or similar benefits are not given on a frequent basis.
- The benefit has a genuine education or training purpose (including attendance at conferences) and is relevant to providing financial product advice; and/or
- The benefit consists of the provision of information technology software or support and is related to the provision of financial product advice in relation to the financial products issued or sold by the benefit provider

Payments or benefits received where the value of the benefit exceeds \$100 are disclosed in a register. A copy of the register is available to you upon request.

Related parties and associations

Your Adviser is a director and shareholder of Financial Adviser Network Pty Ltd and Spinell Financial Services Pty Ltd. and, may receive a salary, dividend and or distribution of profit,

Your Adviser, Spinell Financial or the Financial Adviser' Network, does not currently have any referral arrangements in place with specialist referral partners. We will advise you verbally and in writing at the time we make the referral.

Risks associated with advice

As part of the advice process, your Adviser will explain to you any significant risks associated with the strategies recommended to you. Specific risks associated with any recommended financial product(s) will be detailed in the Product Disclosure Statement or other disclosure document, and research we provide.

These risks may also be highlighted in documents you may receive from us, such as a SoA or RoA, which should be read prior to acting on our advice.

It is important to understand that all investments have risks and that most investments do rise and fall in value. Investment values cannot be guaranteed, and this may mean that at any time the investment value may be less than the amount you started with.

Professional Indemnity

Financial Adviser Network maintains a group policy which includes appropriate Professional Indemnity Insurance cover for Financial Adviser Network and its authorised representatives as required by the Corporations Act 2001.

This cover is designed to offer some insured protection for clients should any work carried out result in a claim against Financial Adviser Network or one of its authorised representatives.

Reporting any concerns

If you have a complaint about any financial service provided to you by your Adviser, you should take the following steps:

1. Contact the Complaints Manager at the Financial Adviser Network to discuss your complaint.

Phone: 0493 384 628

Email: patrick@spinellfinancial.com.au

Mail: **Complaint Manager**

Financial Adviser Network Pty Ltd

PO BOX 252

BELMONT VIC 3216

2. If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA).

AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Phone: 1800 931 678 (free call)

Online: www.afca.org.au

Email: info@afca.org.au

Mail: GPO Box 3

Melbourne VIC 3001

Furthermore, the Australian Securities and Investments Commission (ASIC) has a free of charge Infoline on 1300 300 630, which you may use to obtain information about your rights and to make a complaint.

Your privacy

We take the protection of your personal information seriously.

Our full privacy policy is available via a link on the homepage www.spinellfinancial.com.au of our website at the footer and 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), and how we will deal with your complaint; and
- how we collect, hold, use, process and disclose your personal information in more detail.

We collect personal information, including sensitive information such as health information or identity information, to provide financial advice in compliance with the laws and related services. Your personal information may also be collected, used, reviewed or disclosed Financial Adviser Network as our Australian Financial Services Licensee for supervision, compliance, audit, administration and regulatory purposes.

Technology (including AI systems)

To provide our services, we use technology systems including Customer Relationship Management systems, client portals, document management systems, cloud-based platforms, workflow and compliance systems and AI-assisted tools that have been assessed for privacy, confidentiality, information security and data governance risks and are subject to our internal approval, oversight and governance processes.

These systems may be used to collect, store, organise, process and protect your information as part of the delivery of our services.

Where meetings or discussions are recorded and AI transcribed, we will seek your acknowledgement and consent beforehand. Recordings and AI transcripts may be processed using approved AI-assisted technologies to assist with preparing meeting summaries, file notes and related compliance documentation.

AI-assisted tools do not replace the professional judgement of your

adviser. Your adviser remains responsible for all advice provided to you and for reviewing any information or documents generated with the assistance of technology tools.

Overseas disclosure

Your personal information may also be disclosed, stored, processed, backed up or accessed overseas by our approved service providers, cloud-based technology platforms and outsourced support providers, including staff and providers are located in India. We are also aware of technology providers whose infrastructure or support services which may operate in jurisdictions such as the United States. Where approved AI tools are used, we take reasonable steps to ensure personal information is not used to train public AI models unless authorised by us and permitted by law.

Identification verification

In accordance with Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) laws, we may be required to verify your identity and may collect and record information from identification documents and other information required to meet our customer identification, verification and due diligence obligations.

Protecting your own privacy and security

To help protect your own privacy and security and reduce your risk of inadvertent breaches of the law, we encourage you to stay cyber-aware and share information carefully.

We do not recommend that you send us personal or identity information via unsecured channels such as email, unless appropriate safeguards are applied (for example, password protection or secure file sharing).

Please note that, as a condition of our terms of service, documents we provide to you, as well as copies or transcripts of our communications, must not be uploaded to public or unsecured generative AI tools. Doing so may result in data leakage, loss of confidentiality, privacy or cybersecurity incidents, or breaches of contractual, licensing or intellectual property rights. We cannot accept responsibility for any loss or consequences arising from such use. Your Adviser is required to maintain physical or electronic records of documentation for any financial advice given to you, including information that personally identifies you and/or contains information about you.

These records are required to be retained for at least seven (7) years. If you want to access your personal information at any time, please let us know.

Spinell Financial Services respects your privacy and is committed to protecting and maintaining the security of the personal and financial information you provide us. For detailed information on how we handle your personal information, please refer to our comprehensive Privacy Policy

Contact details

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Email: patrick@spinellfinancial.com.au

Website: www.spinellfinancialservices.com.au