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Unless otherwise disclosed in the product disclosure statement or other disclosure document for the relevant financial product, investments in a financial product issued or distributed by JBWere Limited (JBWere) are not deposits with, or other liabilities of, National Australia Bank Limited (NAB), JBWere, or any other member of the NAB group of companies (NAB Group) and are subject to investment risk, including possible delays in repayment and loss of income and principal invested. Neither JBWere, NAB nor any other member company of the NAB Group guarantees the repayment of capital or the performance or any particular rate of return of the investments purchased through a financial product issued or distributed by JBWere.

This FSG is issued by JBWere. JBWere can be contacted at the addresses in the corporate directory, which can be found on the back cover.

In this FSG, 'we', 'us' and 'our' refer to JBWere.

## The purpose of this FSG

This Financial Services Guide (FSG) is provided to inform you about our services and fees in relation to:

- the JBWere Multi-Asset Platform, an administration platform operated by JBWere and designed to administer and hold your investments; and
  - JBWere's other products and services,
- to assist you when deciding to use the products and services. You should refer to the JBWere Multi-Asset Platform Guide for further information about the JBWere Multi-Asset Platform.

The financial services we refer to in this Guide are offered by your JBWere Adviser on behalf of JBWere. This guide includes information about:

- the financial services and products we can provide;
- the strategic advice and/or product advice you may receive;
- your privacy and your personal information;
- how we handle complaints;
- the significant relationships and associations that we have;
- the remuneration and other benefits that may be received by us or other relevant persons in relation to the financial services we provide; and
- fees and charges you may pay.

### Lack of Independence

We are a wholly owned subsidiary of NAB and are part of the NAB Group. The NAB Group consists of other related entities that are issuers of financial products, some of which are included in our approved product list. This means that we may recommend financial products issued by the NAB Group. We may also receive monetary benefits when you acquire a product based on our advice. As a result, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'.

For further information regarding how JBWere is remunerated, please refer to the section titled **Remuneration and Other Benefits** on page 5 of this FSG.

## How we advise you

If you request that we provide you with personal financial product advice, we need to understand your current financial position, as well as your future needs and goals so that we can give you advice which we can be confident is in your best interests.

In general, we are required to provide you with a Statement of Advice (SOA) the first time we provide you with personal advice about each type of financial product or when there has been a significant change in your circumstance. The SOA will set out our advice to you, the basis upon which it has been developed, detail any fees and remuneration, and disclose any interests and associations we may have which could influence the advice provided to you.

We will provide the SOA before implementing any services in connection with the advice documented in the SOA.

Should you instruct us to provide services immediately, we will give you a SOA within five days of providing the advice.

Where we provide you with further personal advice and your relevant circumstances and the basis of advice are not significantly different from the previous advice given, we will provide further advice via a Record of Advice (ROA).

You may request copies of SOAs and ROAs free of charge at any time, for a period of seven years after the date the advice was given, by contacting your JBWere Adviser.

The SOA will include:

- our understanding of your relevant personal circumstances and your investment objectives;
- any strategies we recommend;
- the basis of those recommendations;
- the financial services and/or products we recommend, and the reasons why;
- our fees and/or commissions; and
- disclosures of any associations we have with financial product issuers or other parties which may have influenced our advice.

When we give you personal advice as a retail client, we have a duty to act in your best interests and prioritise your interests, and are obligated to provide you with appropriate advice.

## Documents you may receive from us

In addition to this FSG and a SOA as described above, you may receive from us:

- the JBWere Multi-Asset Platform Guide (including Part 1 – Service Guide and Part 2 – Fees and other costs), Investment Menu and How To Guide;
- a Product Disclosure Statement (PDS); and/or
- other disclosure documents (where relevant).

In connection with an offer of the JBWere Multi-Asset Platform, you will be given the JBWere Multi-Asset Platform Guide (which includes Part 1 – Service Guide and Part 2 – Fees and other costs). The JBWere Multi-Asset Platform provides access to a service called the JBWere IDPS, an investor directed portfolio service (IDPS). The guide for the IDPS is included in the JBWere Multi-Asset Platform Guide.

A PDS is a type of offer document which provides information about a product (other than listed securities), for example, its features, benefits, fees and associated risks, to enable you to make an informed investment decision.

Generally, a PDS must be given to you in connection with any offer or recommendation to invest in:

- managed investments;
- superannuation products;
- retirement savings accounts;
- deposit products;
- derivatives; or
- standard margin lending facilities.

A prospectus or other offer document may be issued instead of a PDS for some financial products, for example a new listing of securities or debentures.

## The services and products we can provide

JBWere holds an Australian Financial Services Licence. JBWere is authorised under its licence to provide advice in relation to the following financial products:

- basic deposit products;
- non-basic deposit products;
- non-cash payment products;
- derivatives;
- managed investment schemes, including an Investor Directed Portfolio Services (IDPS);
- government debentures, stocks or bonds;
- investment life insurance products including funeral bonds, endowment policies, allocated pensions and annuities;
- securities;
- superannuation;
- foreign exchange contracts;
- standard margin lending facilities; and
- retirement savings accounts.

JBWere is also licensed to:

- deal in each of those types of financial products, other than retirement savings accounts; and
- provide custodial or depository services (including operating investor directed portfolio services).

JBWere provides services via the JBWere Multi-Asset Platform. In connection with these services, JBWere may appoint third parties to provide certain services to JBWere, including a sub-custodian (to hold assets on behalf of JBWere) and a broker.

Assets held by JBWere (or a sub-custodian) in connection with the services JBWere provides may, to the extent permitted by law, be held assets in omnibus accounts mixed with the property and rights of any other person. As far as practicable, JBWere will keep, or cause to be kept, records that identify the assets held on your behalf.

When JBWere provides these services to you, we will generally be acting on your behalf. In certain circumstances, we may be acting on behalf of other parties – please refer to the section of this FSG entitled 'Relationships and associations' for further details.

## Are there any restrictions on our advice?

We can generally only recommend financial products via the JBWere Multi-Asset Platform if those financial products are listed on our approved product list. These include a wide range of products from financial product issuers, including the NAB Group.

Before any financial products are added to our approved product list, a review process is undertaken, and products are required to meet set criteria. If you are receiving personal advice and these products are not appropriate for your circumstances, then we will let you know. At all times, we are obliged to recommend financial products for you only where we are satisfied they are in your best interests.

## Who will give you advice?

JBWere Advisers are approved representatives of JBWere and JBWere is responsible for the advice they provide to you. JBWere Advisers may give you personal or general advice.

If you receive personal advice, this means your JBWere Adviser will take into account your personal objectives, financial situation and needs.

If you receive general advice this means that any advice given by your JBWere Adviser will not take into account your personal objectives, financial situation or needs. You will need to decide if a product or service is right for you.

## What information do we need from you?

In order to provide appropriate advice, your JBWere Adviser will need details of your circumstances, needs and objectives, which would typically include details of your current financial situation and other relevant personal information.

The extent of the information we require will depend on the services you ask us to provide.

You may choose not to disclose information if you do not wish to, however the resulting advice you receive may not be appropriate.

## How advice is provided through the JBWere Multi-Asset Platform

Depending on the complexity of your finances, your financial and lifestyle goals and the level of support you are looking for, your JBWere Adviser will recommend the JBWere advice option that is best suited to your needs.

There are three distinct advice options provided through the JBWere Multi-Asset Platform:

- **Investment Advice** – for clients seeking general advice or personal advice in relation to execution services on a transactional basis for ASX listed investments, securities listed on certain foreign markets, exchange-traded options, term deposits and unlisted bonds.
- **Portfolio Management Advice** – for clients seeking personal advice in connection with portfolio construction and asset allocation with ongoing management via one of two tiers – **Advantage or Premium**. Advantage allows you to access the services and investments provided as part of the Investment Advice option as well as managed funds and consolidated reporting. Premium extends the Advantage offering further by providing access to deposit products and Structured Trades, including over the counter derivatives and structured alternatives (available to wholesale clients only), as well as Capital Gains Tax and performance reporting.
- **Private Wealth Advice** – for clients seeking more comprehensive and strategic personal advice. Private Wealth Advice also allows you to access the services and investments provided as part of both the Investment Advice and Portfolio Management Advice options.

Further information about each of these service options is set out in the JBWere Multi-Asset Platform Service Guide.

## Providing instructions to us

You may give us instructions in person, by telephone, email or letter.

## Your privacy and personal information

We are committed to protecting your, personal information. For further details, including how we use and disclose your personal information and how we access and update it, please refer to our Privacy Notification and Privacy Policy. You can access our Privacy Notification and Privacy Policy by:

- visiting our website at:  
**[jbwere.com.au/general/privacy](http://jbwere.com.au/general/privacy)**
- contacting your JBWere Adviser;
- contacting JBWere Investor Services on 1800 812 267; or
- writing to:  
Manager, Regulatory Compliance  
JBWere Limited  
GPO Box 4370  
MELBOURNE VIC 3001

## How we handle complaints

At JBWere, we work hard to provide exceptional service. Should an occasion occur where our service does not meet your expectations, we are here to listen, learn and work with you to make sure you receive the necessary support.

If you have a complaint, you can contact:

- your JBWere Adviser;
- your local JBWere Head of Advice; or
- the JBWere Regulatory Compliance Manager.

Regardless of who you contact, every effort will be made to reach a resolution with you as quickly as possible.

You can view our Complaints Handling Policy here:

**Complaints Handling Policy ([jbwere.com.au](http://jbwere.com.au))**

If you wish to contact the JBWere Regulatory Compliance Manager, please write to:

Manager, Regulatory Compliance  
JBWere Limited  
GPO Box 4370  
Melbourne VIC 3001

If your complaint isn't resolved to your satisfaction within 30 days, you may have the right to take it to the Australian Financial Complaints Authority (AFCA), an independent complaints resolution body.

AFCA is an external dispute resolution scheme that provides free advice and assistance to consumers and investors to help them resolve complaints relating to members of the financial services industry, including managed investment schemes, pooled superannuation trusts, financial advice, investment advice and sales of financial or investment products. You can contact them at:

**Phone** 1800 931 678 (free call)

**Mail** Australian Financial  
Complaints Authority  
GPO Box 3  
MELBOURNE VIC 3001

**Email** [info@afca.org.au](mailto:info@afca.org.au)

**Online** [www.afca.org.au](http://www.afca.org.au)

## Professional Indemnity insurance and compensation arrangements

JBWere holds professional indemnity insurance that satisfies the requirements for compensation arrangements under section 912B of the Corporations Act. This insurance also covers the conduct of advisers who were authorised by us at the time you received the relevant service, and are no longer representatives of JBWere.

## Financial crimes monitoring

Under anti-money laundering and counter terrorism laws, we must meet strict identification requirements before we can provide services to you. Where we are legally obliged to do so, we may disclose the information we have gathered about you to regulatory or law enforcement agencies.

You should also be aware that transactions may be blocked or declined where we have reasonable grounds to believe they breach Australian law or the law of any other country.

## Relationships and associations

### Our relationship with NAB

JBWere is a wholly owned subsidiary of NAB.

JBWere is required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of retail clients.

We may recommend financial products and services issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group entity.

These include products and services with the following branding:

- NAB, National
- WealthHub Securities

If we recommend a product or service issued by a NAB Group company, that company will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

JBWere may from time to time distribute to its initial public offerings and capital raisings originated by the NAB Group.

From time to time members of the NAB Group may also have other interests in or receive monetary or other benefits from financial products which we may recommend to you where we believe this is appropriate, for example, a member of the NAB Group may be a lender to a listed entity whose products are recommended to JBWere clients.

NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by JBWere or its representatives.

If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website [www.moneysmart.gov.au/investing/financial-advice](http://www.moneysmart.gov.au/investing/financial-advice).

## Other relationships and associations

We may refer you products and services from related or unrelated providers including managed funds, margin lending, investment opportunities, investment market research, capital markets transactions, insurance, superannuation services and administration services.

Where permitted by law, we may pay referral fees where third parties refer clients to us or we may receive referral fees where we refer clients to third parties (refer page 6 for details).

JBWere may act as your agent to give instructions to a broker on your behalf to trade on the ASX, or on other Australian or international stock exchanges or financial markets. JBWere may also be buying or selling financial products 'as principal' on the ASX or other stock exchanges or financial markets. From time to time, JBWere may be acting as agent for you and 'as principal' in relation to the same financial product. In such cases, JBWere does not have any control or discretion over orders once they are submitted to the broker.

## Remuneration and other benefits

### How we are paid

You and your JBWere Adviser will agree on an appropriate fee structure.

Generally the remuneration and other benefits we receive in respect of the financial services we provide to you may take the form of one, or a combination of:

- fees determined as a percentage of the value of the assets of any portfolio we administer for you;
- fees charged as a flat dollar amount;
- transaction fees, determined as a percentage of the consideration for the transaction, for example brokerage fees for arranging transactions for you in listed securities;
- fees charged at a fixed rate for additional services provided, including (but not limited to) certain strategic financial planning services for which we will charge an hourly rate as agreed with your JBWere Adviser before the advice is given;
- underwriting and stamping fees paid to a member of the NAB Group or other issuers as remuneration for JBWere distributing initial public offerings and other capital raisings;
- service fees paid to us by product issuers as consideration for services provided by us to those product issuers (for example, in relation to offering managed funds via the JBWere Multi-Asset Platform);
- in certain circumstances, for investment products (and to the extent permitted by law) initial and ongoing commission paid to us by issuers of financial products including related parties when you choose to invest in one of their products. Commissions and fees vary for each product and will be set out in the offer document (if applicable) and/or provided to you at the time the advice is given or the financial service is provided (or as soon as practicable thereafter);
- referral fees for referring clients to other professionals, such as accountants. We may also pay referral fees if someone refers clients to us. We will disclose these fees to you at the same time we provide you with advice or at the time we make the relevant referral (if applicable). These fees are generally in the form of:
  - a fixed fee;
  - a proportion of the fees or commissions we disclose to you; or
  - a combination of both.

Details of any payments we receive from financial product issuers are contained in the Product Disclosure Statements that we will provide you with when recommending a financial product.

The standard fees payable in connection with the JBWere Multi-Asset Platform are set out in the section of this FSG entitled 'Fees for the JBWere Multi-Asset Platform'.



## Other remuneration and benefits received by related entities and associates of JBWere

If members of the NAB Group or their associates issue, provide or distribute financial products or services that you acquire through us, those NAB Group members or associates may receive fees from you in relation to those products or services. The fees and benefits received by those NAB Group members, or associates will include those set out in the terms and conditions and disclosure documents for those products or services, or will otherwise be notified to you by your JBWere Adviser. The NAB Group member(s) may pay JBWere up to 100% of those fees. The payments may ultimately benefit other members of the NAB Group and executives or other associates of those companies.

The types of fees that members of the NAB Group may charge you include:

- brokerage or other transactional fees (which may be charged when they purchase or sell securities for you at the request of JBWere);
- fees charged at a fixed rate for services provided;
- foreign exchange fees charged on the value of your foreign exchange transaction; and
- management fees.

## Fees for the JBWere Multi-Asset Platform

The remuneration (including commissions) and other benefits that JBWere and relevant persons receive from you in relation to your JBWere Multi-Asset Platform account depend on the financial services that are provided to you.

All fees disclosed in this document are in Australian dollars and where applicable inclusive of GST and net of reduced input tax credits (if applicable). We reserve the right to change these fees from time to time.

Some of the fees we charge may be tax deductible. Please speak with a professional taxation adviser who can advise regarding to your particular circumstances.

## Fees for the Private Wealth Advice and Portfolio Management Advice options

### *Portfolio Administration Fee*

If you receive services as part of the Private Wealth Advice or Portfolio Management Advice options from JBWere through the JBWere Multi-Asset Platform, JBWere will charge you a Portfolio Administration Fee as a flat dollar amount up to \$2,500 per annum.

### *Portfolio Advice Fee*

JBWere will also charge you a Portfolio Advice Fee in relation to advice given to you in relation to your portfolio. The Portfolio Advice Fee applicable to you will be set out in your JBWere Multi-Asset Platform Fee Schedule and will depend on your advice option. This fee is subject to the Minimum Fee set out below, and may consist of:

- a tiered percentage amount per annum of the average value of your portfolio (this tiered fee will depend on your chosen advice option); or
- a combination of both a flat dollar amount and a tiered percentage amount per annum of your portfolio value.

The tiered percentage based Portfolio Advice Fee may range up to 1.85% pa of the value of your portfolio in the Private Wealth Advice option, and up to 1.65% pa of the value of your portfolio in the Portfolio Management Advice option. The portfolio used to calculate this fee consists of any assets you hold through the JBWere IDPS. If you also have a JBWere Managed Accounts service in connection with either of these advice options, this will be included in your average portfolio value for the purposes of calculating your Portfolio Advice Fee<sup>2</sup>.

### *Minimum management costs charged by JBWere*

Regardless of the composition of your Portfolio Advice Fee calculated as described above, the minimum aggregate of the Portfolio Administration Fee and Portfolio Advice Fee you will pay (**Minimum Fee**) is:

- \$1,875 per quarter for the Private Wealth Advice option;
- \$1,875 per quarter for the Portfolio Management Advice (Premium) option; and
- \$375 per quarter for the Portfolio Management Advice (Advantage) option.

If the sum of the Portfolio Administration Fee and the Portfolio Advice Fee calculated as described above (**Calculated Fee**) is less than the Minimum Fee for your advice option, you will be charged the Minimum Fee.

Where the Minimum Fee is charged, the difference between the Calculated Fee and the Minimum Fee will form part of your Portfolio Advice Fee.

The Portfolio Administration Fee component of your Calculated Fee will stay the same.

<sup>1</sup> For certain investors, a percentage based Portfolio Advice Fee cannot be charged on borrowed amounts that are used to invest through the JBWere Multi-Asset Platform. Please speak to your JBWere Adviser if you are using borrowed monies to invest through your portfolio.

<sup>2</sup> Note that if you have a JBWere Managed Accounts service but no other investments in the JBWere IDPS, your portfolio management fee is calculated differently. Ask your JBWere Adviser for more information.

## Other fees

In addition, you may be charged:

- transaction fees at the rates specified under 'Fees for the Investment Advice option';

- A foreign exchange fee of up to 1.0% is charged on the value of your foreign exchange transaction, and will be deducted from the consideration of the trade. The foreign exchange fee is charged by JBWere. The exchange rate executed with NAB is negotiated on your behalf by JBWere.

## Fees for the Investment Advice option

We charge the following fees when you instruct our advisers to purchase or sell investments for you.

### i. Transaction fees

	ASX Listed Investments	Exchange Traded Options	International Securities	Term Deposits	Unlisted Bonds (min. parcel \$500,000)
<b>Transaction fees (up to)</b>	2.20% of the value of the trade	2.20% of premium payable to the buyer (taker) of the option  <b>Plus</b> ASX Clear fees <sup>1</sup>	2.20% of the value of the trade  <b>Plus</b> International market exchange fees <sup>1</sup>	0.25% pa of amount invested	As agreed with your JBWere Adviser
<b>Minimum per trade</b>	\$137.50	\$137.50	\$100.00	No minimum	No minimum
<b>Paid/Deducted from</b>	Cash Account	Cash Account	Cash Account	Deducted from interest paid	Deducted from yield
<b>When incurred</b>	Upon execution	Upon instruction to buy/sell	Upon execution	Variable depending on product issuer. Please ask your JBWere Adviser.	Upon execution

<sup>1</sup> These fees are in addition to your JBWere transaction fees and are charged by ASX Clear or the relevant international market exchange. For a current listing of all ASX Clear fees and fees charged by international market exchanges please refer to [www.asx.com.au](http://www.asx.com.au) or speak with your JBWere Adviser.

### ii. Off-market share transfers (Australian listed securities)

If you make an off-market transfer, for example, you transfer an unlisted security, or transfer a listed security, but not on the market on which it is listed, you will be charged an off-market transfer fee of up to \$192.50 (plus applicable government charges) per transfer.

### iii. Settlement and dishonour fees

We may charge up to 15% pa (calculated daily and charged monthly with a minimum of \$50 per month) of the value of the trade for early and failed settlements on ASX listed investments until the amount outstanding is paid. We may also recover the costs of any charges incurred if a direct debit, direct credit or cheque is dishonoured. These fees will be deducted from your Cash Account when we incur the cost.

## How your JBWere Adviser is paid

Your JBWere Adviser is a salaried employee of NAB and may receive regular incentive payments in the form of a percentage of revenue, in addition to their base salary and superannuation.

Provided that:

- i. there is a valid client direction to make the payment in place, where required; and
- ii. your Adviser satisfies certain non-financial measures (including in relation to compliance)

we will pay your JBWere Adviser an amount calculated as a percentage of between 38% and 50% of the fees received by JBWere (net of certain costs and deductions and any other revenue which JBWere is not permitted by law to pass on to Advisers). The amount paid takes into account adjustments for your JBWere Adviser's salary and superannuation.

These amounts are not an additional cost to you.

Payment of part of your Adviser's remuneration may be deferred for 12 months.

Further information about your JBWere Adviser's remuneration can be found in the 'JBWere Adviser Remuneration Summary' available on request from your Adviser or JBWere.

To the extent permitted by law, JBWere Advisers may also receive alternative forms of remuneration such as the costs of maintaining their professional development qualifications.

Your JBWere Adviser may attend professional training either subsidised or wholly funded by product providers which issue products available in connection with our services.

JBWere keeps a register detailing certain non-monetary benefits that the adviser receives (e.g. benefits valued between \$100 and the maximum of \$300, genuine education or training and information technology software or support). You can review an extract of the register by contacting your JBWere Adviser.

## Disclosure of fees and other benefits

If you receive personal financial product advice from us, we will give you details of any relevant fees, commissions and other benefits, in our written advice (where applicable) or verbally. Where possible this information will be in actual dollar amounts but where this is not possible we will tell you how the benefits are calculated.

If you do not receive personal financial product advice from us, we will give you on request details of any fees, commissions and other benefits in relation to any other financial service we provide to you.



## Corporate directory

You can contact JBWere using the details below.

### Melbourne

Level 31, 405 Bourke Street  
Melbourne VIC 3000  
Telephone: +61 3 9906 5000

### Adelaide

Level 13, 60 King William Street,  
Adelaide SA 5000  
Telephone: +61 8 8407 1111

### Canberra

Level 10, 1 Constitution Avenue,  
Canberra ACT 2601  
Telephone: +61 2 6218 2000

### Sydney

Level 10, Brookfield Place,  
10 Carrington Street  
Sydney NSW 2600  
Telephone: +61 2 9325 2600

### Brisbane

Level 15, 259 Queen Street  
Brisbane Qld 4000  
Telephone: +61 7 3258 1111

### Perth

Level 14, 100 St Georges Terrace  
Perth WA 6000  
Telephone: +61 8 9212 7900