

Financial Services Guide

1 November 2018

JBWere

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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 FSG is provided to inform you about our services and fees, and to assist you when deciding whether to use those services. It is also relevant where you obtain services from a financial services provider other than us or a JBWere Adviser, and your financial services provider uses our services on your behalf or has referred you to us for the provision of particular services they do not offer, for example, the execution of a share trade on the ASX or other Australian or international stock exchanges or financial markets.

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 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.

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 circumstances. We must give it to you before we provide any services in connection with the advice documented in the SoA.

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

After that, any time we give you further personal advice, we will give you (or keep on file) another written record of that advice.

You may request a copy of this record free of charge at any time, for a period of seven years after the date the advice was given, by contacting your JBWere Adviser or your financial services 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.

Documents you may receive from us

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

- a Product Disclosure Statement (PDS); and/or
- other disclosure documents (where relevant).

A PDS is a type of offer document which provides information about a product, 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;
- insurance 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 Service (IDPS);
- government debentures, stocks or bonds;
- investment life insurance products, including funeral bonds, endowment policies, allocated pensions and annuities;
- life risk insurance products, including term life, total and permanent disability, trauma and income protection;
- 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).

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.

When JBWere provides 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 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 minimum standards. If 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 or 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.

If you access our services through a financial services provider, any personal advice we give you will be based on the information provided to us by your financial services provider.

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 can choose not to tell us, if you do not wish to, however the advice you receive may not be appropriate.

Providing instructions to us

You may give us instructions in person, by telephone, email, letter, or fax. If you access our services through a financial services provider, you must give your instructions to your financial services provider (using the methods you have agreed with them), and your financial services provider will then instruct us.

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**
- contacting your JBWere Adviser;
- contacting JBWere Investor Services on 1800 812 267; or
- writing to:
Privacy Officer
JBWere Limited
GPO Box 4370
MELBOURNE VIC 3001

How we handle complaints

If you have a complaint, we encourage you to discuss the matter with your JBWere Adviser, their Manager or your financial services provider.

If you are not happy with the response you receive, please write to:

Compliance Manager
JBWere Limited
GPO Box 4370
MELBOURNE VIC 3001

When dealing with a complaint you have submitted to us in writing:

- we will provide written acknowledgement of our receipt of your complaint in the first instance; and
- we will prepare a response in consultation with your JBWere Adviser and his/her Manager and/ or your financial services provider. All matters will be thoroughly investigated and responded to. We aim to do this within 30 days.

If your complaint is not resolved to your satisfaction or within 45 days, you may have the right to take your complaint 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 in resolving 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.

Phone	1800 931 678
Mail	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
Email	info@afca.org.au
Online	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, but are no longer representatives of JBWere.

Financial crimes monitoring

Under anti-money laundering and counter terrorism laws, we have to 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 the NAB Group.

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 member (including MLC Limited) and who may pay us a commission.

These include products and services with the following branding:

- NAB, National
- MLC
- Fairview Equity Partners
- JANA Investment Advisers
- Ausbil Investment Management
- Antares Capital
- Pengana Capital
- Altrinsic Global Advisers
- Plum or Plum Super
- Redpoint Investment Management
- Threesixty Research
- Northward Capital
- Presima Inc
- 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 clients 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.

Other relationships and associations

We may offer 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 administrative 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 below for more information). Where the referrer is your financial services provider, we may pay your financial services provider a part of any fees we charge for our services. The amount payable is agreed between us and your financial services provider.

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.

JBWere has relationships with a number of risk insurance providers which may pay JBWere a licensee commission payment. Refer to the 'How we are paid' section of this FSG for details. NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

MLC Limited will pay National Wealth Management Services Limited, a related body corporate of NAB, a distribution allowance. Refer to the 'Distribution allowance' section of this FSG for details. If appropriate to your requirements, objectives and circumstances then a JBWere Adviser may recommend a risk insurance policy issued by one of these insurers or an insurance policy issued by MLC Limited.

Fees and charges you may pay

The fees and charges payable depend on the financial services that are provided to you. All fees disclosed in this document are in Australian dollars 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 give consideration to your particular circumstances.

Type of Financial Service	Fee charged
Initial Strategic Advice (Advice preparation)	Minimum \$3,300 An initial advice fee will be charged for the preparation of a written Statement of Advice. The initial advice fee will increase based on the nature and complexity of the advice. The advice preparation fee will be agreed with you upfront and will be disclosed within your Statement of Advice.
Ongoing Strategic Advice (Ongoing Advisory Service)	Minimum \$5,500 per annum For this service, the ongoing advice fee will be based on the level of service needed and the complexity of the advice and will be determined by agreement with you. It may be either a flat fee or a tiered percentage amount per annum of the average value of your portfolio or a combination of both. Complex advice requirements include the use of trusts and other ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged.
Initial protection advice only	An initial advice fee may be charged for the preparation and implementation of a written Statement of Advice. The amount of the fee will be based on the complexity of the advice. This will be agreed with you up front and will be disclosed within your SoA. Fees may be collected via one of the following methods: <ul style="list-style-type: none"> • as initial commission of up to 88% of the first year's annual base premium paid to us by the insurance product issuer; • as a Flat Fee for Advice paid by you, with the upfront commission received from the insurance provider rebated to you; or • a combination of the above.
Ongoing protection advice only (Ongoing Advisory Service)	JBWere offers ongoing protection advice. The fee for this service is received as either: <ul style="list-style-type: none"> • an ongoing fee of up to 22% of the value of your annual base premium, paid to us annually by the insurance product issuer; • as a Flat Fee for Advice paid by you, with any ongoing commission received from the insurance provider rebated to you; or • a combination of the above.
Ad hoc advice	By agreement with your JBWere Adviser Where you do not wish to participate in the Ongoing Advisory Service, but require ongoing advice on an ad hoc basis, you will be charged an hourly fee at a rate agreed with your JBWere Adviser.
Transactional Fees	You may incur transaction fees where you instruct your JBWere Adviser to purchase or sell investments for you. See below for our standard fees.

We will tell you about the fees and commissions that are relevant to the products and services we provide you at the relevant time.

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

¹ These fees are in addition to your JBWere transaction fees and are charged by ASX Clear. For a current listing of all ASX Clear fees please refer to 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.

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) 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 platforms we operate);
- 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 margin loans) including by related parties when you choose to invest in one of their products. Generally the product issuer may pay us an ongoing commission of up to 0.66% pa of the value of your investment. 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);
- in certain circumstances, for insurance products (and to the extent permitted by law), initial and ongoing commission paid to us by issuers of insurance products including by related parties when you choose to acquire one of their products. Generally, the issuer of the insurance product may pay us an initial commission of up to 88% of

the first year's annual base premium and ongoing commission of up to 22% of the value of your annual base premium. 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 product is provided (or as soon as practicable thereafter);

- commission payments from risk insurance providers. Where you acquire a risk insurance policy issued by AIA, Zurich and OnePath the insurer may pay JBWere a commission payment which is based on total in-force premium and lapse rates for all risk insurance policies as at 31 December 2017 recommended by the JBWere Advisers. The payments received by JBWere may be up to 2% of the premium amounts paid by policy holders to the relevant insurer. These payments are not shared with your JBWere Adviser. These payments do not represent an additional charge to you and your Adviser will disclose in your Statement of Advice insurance products for which these arrangements may apply.
- 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 (as applicable). These fees are generally in the form of:
 - o a fixed fee;
 - o a proportion of the initial and/or ongoing fees or commissions we disclose to you; or
 - o a combination of both.

Details of any payment 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 products and services referred to in this FSG are as set out below in the section of this FSG entitled 'Fees and charges you may pay'.

Distribution allowance

MLC Limited pays a distribution allowance to National Wealth Management Services Limited, a related body corporate of NAB, in respect of the distribution of MLC Limited's insurance products by licensees in the NAB Group (including NAB). This amount is not ascertainable at this time

and will depend in part on the value of MLC Limited's insurance portfolio relating to insurance distributed through NAB and its related bodies corporate and the performance of NAB and its related bodies corporate against agreed annual performance criteria.

This allowance is not shared with your JBWere Adviser and does not represent an additional charge to you.

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 (including via your financial services provider), 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; and
- management fees.

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 37.5% and 48.5% of the revenue received by JBWere which is attributed to your JBWere Adviser (net of certain costs and deductions and any other revenue which JBWere is not permitted by law to pass on to its Advisers).

The amount paid takes into account adjustments for your JBWere Adviser's salary and superannuation.

Your Adviser may also receive an annual payment in the form of a share in the Annual Outperformance Incentive Pool.

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 and free of charge 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. JBWere Advisers may attend professional training either subsidised or wholly funded by product providers that issue products available to be accessed in connection with our services.

JBWere keeps a register detailing certain nonmonetary benefits that the adviser receives (e.g. benefits valued between \$100 and \$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, at the relevant time. 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 16, 101 Collins Street
Melbourne Vic 3000

Telephone: +61 3 9906 5000

Fax: 1300 798 149

Sydney

Level 42, Governor Phillip Tower
1 Farrer Place
Sydney NSW 2000

Telephone: +61 2 9325 2600

Fax: 1300 307 307

Adelaide

Level 6, 22 King William Street
Adelaide SA 5000

Telephone: +61 8 8407 1111

Fax: +61 8 8407 1112

Brisbane

34th Floor, Riverside Centre
123 Eagle Street
Brisbane Qld 4000

Telephone: +61 7 3258 1111

Fax: +61 7 3258 1112

Canberra

Level 3, 60 Marcus Clarke Street
Canberra ACT 2600

Telephone: +61 2 6218 2000

Fax: +61 2 6218 2001

Perth

Level 11, 100 St Georges Terrace
Perth WA 6000

Telephone: +61 8 9212 7900

Fax: +61 8 9212 7999