



Financial Services Guide

VERSION 3.0 – 10 July 2017

ABN 43 162 297 298

**Australian Financial Services Licence Number
437518**

IMPORTANT INFORMATION ABOUT THIS GUIDE AND ADVICE GROUP

AVALONfs Pty Ltd (AVALON) is an Australian financial services licensee offering a comprehensive range of financial services. Central to these operations are the provision of financial advice and the distribution of investment and risk insurance products to clients who have the foresight and need to build their wealth and plan for the future.

AVALON is the provider of any advice that you may receive and this FSG has been developed to provide you with important information about the services we offer.

In this Financial Services Guide (FSG) 'we', 'our', 'us' or 'AVALON' means AVALONfs Pty Ltd (ABN 43 162 297 298) holding Australian Financial Services Licence (AFSL) 437518.

IMPORTANT NOTE ON ADVICE

Your adviser is authorised by AVALON to provide advice in the areas specified within their Certificate of Authorisation issued by AVALON. These authorisations can also be found on the last page of this FSG.

Your adviser may provide advice in areas such as accounting and taxation, but only if they are a qualified accountant; mortgage advice, if they are authorised by a credit provider; or property only if they are a licenced real estate agent.

Advice in these areas is **not** provided by AVALON and should not appear in any advice documents provided to you by your adviser from AVALON.

You must read all of this guide carefully.

Key Information Statement

The Financial Services Guide (FSG) is designed to assist you in deciding whether to use any of the products and services offered by AVALONfs (AVALON) and our Advisers.

The information in the FSG covers such aspects as:

- Information about AVALON as licensee
- Who will be responsible for providing the financial services described within this FSG and provided to you as the client.
- Details of the financial services and/or products AVALON can provide as well as details of what services and/or products AVALON does not provide
- The financial planning process
- Documents you may receive
- Further important information about the advice/recommendations
- Remuneration received by AVALON and your adviser
- Relationships which might influence AVALON or your adviser in providing financial services
- The complaints procedure and compensation arrangements.

Should your adviser provide advice and/or a financial product to you, you will receive a Statement of Advice (SoA) and various Product Disclosure Statements (PDS).

The SoA details the financial advice provided to you, and covers such matters as the advice and product recommendations, any remuneration payable, the risks and disadvantages associated with the advice and/or product recommendations, and all details of any relationships which might influence your adviser in providing the financial advice and/or product recommendations.

The PDS details all aspects of the investment and/or risk insurance product(s) recommended.

The purpose of these documents are to keep you fully informed in relation to the end to end financial planning process.

This Financial Services Guide (FSG)

This FSG is an important document which provides you with information about AVALON and the advice and services that we are licensed to provide, and the fees you are likely to pay for that advice.

Each adviser is issued with a Certificate of Authorisation which defines the advice and products the adviser is able to provide. At the back of this FSG is an Authorisation Statement which also details these authorities of the specific knowledge and experience of your adviser.

Relationship between AVALON and your adviser

Your adviser provides financial services on **behalf of AVALONfs Pty Ltd AFSL 437518.**

When your adviser has adhered to AVALON's Approved Product List AVALON is responsible to you for any of the financial advice services that your adviser has provided.

This FSG includes details of the adviser's Authorised Representative number, accreditations, qualifications and experience, the areas of advice and types of investment

and/or risk insurance products or services we have authorised your Adviser to provide to you. Details of remuneration payable by you to your adviser are generally negotiated between you and your adviser.

AVALON demands a minimum standard of professional behavior from all of its advisers and Advisers are required at all times to act in the best interests of their clients, to act honestly, professionally, fairly and objectively and without conflict in the provision of the financial services offered by AVALON.

You may ask for a copy of the original Certificate of Authorisation at any time from your Adviser or AVALON.

Financial services and product offering by AVALON

AVALON is authorised to offer services and/or products to in the following areas:

- Financial Planning
- Salary packaging
- Social security
- Estate planning
- Basic and non-basic deposit product
- Managed Investments
- Gearing strategies
- Structured product strategies
- Securities
- Superannuation
- Retirement planning advice
- Self-Managed Superannuation Funds advice
- Personal and business risk insurance
- Standard margin lending

Your Adviser may only be authorised to provide advice to you in **some** of the above areas.

Please refer to the Authorisation Statement at the back of this FSG which sets out the areas of advice and types of products that your Adviser is authorised to provide.

What services and or products does AVALON not provide?

AVALON is responsible for only those services and products set out in its AFSL and your advisers FSG.

The Adviser **must not** provide any other services or products other than those listed in the Certificate of Authorisation. The products below are examples of advice services and products not supported by AVALON.

- Banking services (other than cash or term deposits)
- Credit assistance and credit activity
- Loan facilities including residential loan facilities, other than those that encompass both a margin loan
- General insurance advice
- Legal advice
- Accounting advice
- Real estate property advice
- Derivatives or Foreign Exchange

If you have any concerns in this regard please contact our Compliance Officer directly on 0407401136

The Financial Planning Process

AVALON's aim is to ensure that you are provided with the advice tailored to your needs.

The steps that follow provide an overview of how this process is effected, and ensures that the proper disclosure of the risks associated with your particular investments are explained and that you provide us and your adviser with the correct information about your actual circumstances so that we are able to provide you with the appropriate advice to meet your specific requirements.

Step 1

You have been provided with this FSG. In the case of any general advice that has been provided, you will be provided a suitable general advice warning.

In order that your Adviser can provide you with the most appropriate advice, you will be asked to provide information about your personal circumstances. This will include information about your short and long term goals & objectives and your current financial situation.

Step 2

The information collected is recorded in a Client Data Form. This together with a Client Risk Profile assessment enable the Adviser to analyse and determine the most appropriate advice for your particular circumstances that are in your best interests.

Step 3

Consideration is also given to the identification of any financial issues that may be present or that may arise in the future such as long term illnesses. The solution will be tailored to your relevant personal circumstances with the objective of matching your risk profile and meeting your goals and objectives as well as protecting those plans put in place.

Step 4

A Statement of Advice (SoA) is then prepared and provided to you by your Adviser.

This SoA sets out various recommendations made by your adviser, the basis on which those recommendations are made and, amongst other things, the remuneration payable for researching, designing, implementing and maintaining those products and services recommended.

Step 5

Subject to your agreement and signed instructions, the recommendations will be implemented.

Step 6

The information contained in the SoA, will be reviewed and revised at regular intervals as agreed by you, or when your particular circumstances change.

Documents you may receive

You may receive one or more of the following documents when the Adviser provides advice and/or any recommendation(s) on investment and/or risk insurance products to you:

1. Statement of Advice (SoA)

The SoA may be a full advice document given to clients where personal advice has been provided with that advice taking into account your current financial position, goals, objectives, as well as your short, medium and long term needs.

You must confirm your adviser's assessment of your personal financial circumstances, goals and objectives and risk profile as well as confirming acceptance of the advice provided through the SoA.

Limited or scaled advice

Some SoAs may be scaled advice SoAs where the advice contained is limited to specific advice either requested by you the client, or limited because you did not want to provide personal details or refused the complete advice offered.

In these circumstances you will be required to acknowledge these limitations.

2. Statement of Advice

(Incorporation by Reference) [SoA (IBR)]

The SoA (or RoA) IBR represents a streamlined SoA/RoA that is appropriate for your adviser to use when providing further advice to a client with whom a SoA has previously been provided.

Its usage avoids unnecessary duplication of information already provided to clients. However you may be required to sign a confirmation that your circumstances have not changed materially from those confirmed in the previous SoA.

3. Record of Advice (RoA)

If your adviser has previously provided you with a SoA and then provides you with related additional advice, generally in the form of product advice and inclusive of periodic reviews (which takes into account your relevant personal circumstances), you will receive written confirmation of that advice. This may be in several forms but is still considered a RoA and will be added to your client file along with any notes.

If further or additional advice is provided by your adviser, you are able to obtain a written copy of that advice (if it has not already been given) by contacting your adviser and requesting a copy in writing. You may make such a request up to seven years after the advice has been given.

Key information contained within AVALON advice documents may include:

- Your personal and financial circumstances;
- Your stated goals and objectives;
- The advice given;
- The basis on which the advice and/or financial product recommendations are given;
- The risks and/or disadvantages associated with the advice/recommendations;
- Information about remuneration or other benefits that may be received; and
- Any benefits, interests or associations that may have influenced your adviser in the provision of the advice.

4. Product Disclosure Statement (PDS)

Should your adviser make a recommendation to you about a particular investment and/or risk insurance product or offer to arrange the issue of a financial product on your behalf, you will receive a PDS, prepared by the product provider.

The PDS will contain information that will assist you in making an informed decision about that product and should be viewed as an extension of the SoA.

The PDS usually includes information about product features, risks that your adviser should go through with you in detail, the costs associated with that product as well as details of other fees and charges which may apply, including management expense ratios (MER's) and remuneration payments to Advisers.

Usually the PDS will contain the application document that you will be required to complete in relation to that investment or risk product.

Further information about the advice and / or recommendations

Will advice be given that is suitable to your needs and financial circumstances and in your best interest?

Your adviser is obliged by law to do so and must be able to demonstrate to you that a reasonable basis exists which supports the personal advice they provide to you, and that that advice is in your best interest.

To be clear, your adviser will need to ascertain your goals, objectives, financial situation, relevant personal and financial circumstances and needs before he or she recommends any advice, investment and/or risk insurance products or services to you.

You will be asked to provide accurate information on the above and to keep your adviser updated on any changes to ensure the advice provided and products recommended remain relevant to your personal circumstances.

You have the right not to divulge any information should you not wish to do so. In that case, your adviser will warn you about the possible consequences of not providing relevant personal and financial information including limitations on the advice which can be provided.

You should thoroughly read the information in your SoA before making any decisions relating to the advice or any investment and/or risk insurance product or service.

What should you know about any risks of the advice, investment and/or risk insurance products or services that are recommended to you?

Please be aware that there are risks associated with investing in financial markets which may adversely affect the value of your investment(s).

Your adviser will explain to you, and fully outline in the SoA, both the generic and specific risks of the financial products recommended to you.

Product Disclosure Statements will also outline the key risks associated with that particular product being recommended. You must read and consider both the Risks & Disadvantages section of the SoA in conjunction with the relevant PDS material before proceeding to purchase any product recommended.

If you feel that you need further clarification in any area of a product or the advice contained in the SoA, please ask your adviser prior providing your confirmation to proceed.

Does AVALON provide Tax advice?

No. Although AVALON and some of its advisers are Registered Tax Advisers with the Taxation Practitioners Board (AVALONfs Pty Ltd TPB RN: 25313984) AVALON does not provide taxation advice. You should seek your own taxation advice from your tax professional.

Your adviser may also recommend a registered tax accountant for this purpose.

In some cases your adviser may be an accountant. In this case taxation advice will be outside of the financial planning advice provided by them under AVALON within the SoA.

Reviews

Markets, investments, and your personal and financial circumstances can change over time.

Reviewing your goals, circumstances, advice, investments and/or risk insurance products held, is vital to ensuring that you remain on track to meet your short to long-term objectives.

A comprehensive personal review service is offered by your adviser to all clients, which will update advice in line with your ongoing needs, and implement any changes agreed with by you. AVALON requires its Advisers to provide regular reviews to each client on a regular basis preferably annually.

A fee may be charged for ongoing advice and management of your financial affairs dependent on the type and the complexity of the service being provided by your adviser.

Your adviser will provide you with full details of all fees before doing any significant work for you.

Fees will be explained in a meeting and detailed in the Statement of Advice (SoA).

If your adviser provides an ongoing service for which you are invoiced and you pay regularly for those services, your adviser will provide you with a detailed breakdown of these ongoing fees and the services provided in the form of an annual Fee Disclosure Statement (FDS).

Your adviser must also request you to 'Opt-in' to this ongoing service on a biennial (each two year period) basis.

Remuneration received by AVALON and your Adviser

AVALON and your adviser fees.

AVALON receives no investment commissions or any volume bonus' from any of its product providers. It may receive commissions from life insurance companies in relation to risk insurances.

AVALON Advisers pay a monthly service fee to AVALON. This fee is a flat fee and has no correlation with the amount of business written nor any Funds Under Management or volume of business on risk products. As AVALON receives all fees and commissions, we may deduct this Licence fee from your adviser's fees and commissions.

AVALON is responsible for the advice provided to you, therefore AVALON **must** receive all advice fees and any commissions paid by the product issuer.

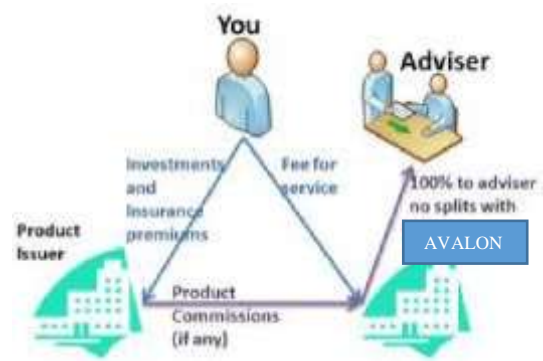
Therefore, ALL invoices from your adviser must be remitted directly to AVALON's trust account.

AVALON passes all fees and commissions received for advice from all sources to the adviser without any split of these fees other than any fees owed by the adviser to AVALON.

What remuneration will your adviser receive?

The cost of providing a financial product or service to you will depend upon the nature and complexity of the advice, financial product and/or service provided. Generally, whenever your adviser provides a recommendation for an investment and/or risk insurance product or service, AVALON and your adviser may be remunerated singularly or through a combination of initial fee for service, ongoing adviser service fees and legacy ongoing product fees.

The following flowchart is an overview of the fee process you may undergo with your adviser.



Details of the types of remuneration which may apply are as follows.

Fee for Service charged by your adviser, including an ongoing Adviser Service Fee

If a Fee for Services is to be charged, the Fee for Service may be based on either:

- A fixed dollar amount;
- A percentage of the value of funds initial investment;
- A determined amount, based on the number of hours spent developing your advice document; or
- A combination of these.

Alternatively, your adviser may invoice you or arrange a direct debit facility for an ongoing service (such as portfolio maintenance or regular reviews), which may be calculated as a percentage of your total investment balance.

Your adviser will provide you with further details where relevant and these will be detailed in the SoA.

Your adviser will also provide you with a detailed breakdown of ongoing fees on an annual basis in a fee disclosure statement (FDS).

Initial Fee(s)

When the Initial Fee is to be charged, the fee may be paid directly to AVALON by cheque, credit card or EFT, or paid via the issuer of the investment and/or risk insurance product(s), which your adviser has recommended.

With investment products, this payment may be deducted from the initial amount you have invested with the relevant product provider at the time the investment product is placed and issued to you.

With risk insurance products, this commission is not deducted from the insurance premium. It is paid to AVALON by the relevant insurance provider and is calculated on the premium payable.

Any fees payable by you will be detailed in the Statement of Advice provided by your adviser.

Ongoing Investment Product Fees

From the 1st of July 2014, if you are a new client to AVALON's Pty Ltd your adviser will not receive any ongoing product fees from any investment products invested in by you.

If you are an existing investment client and an Ongoing Product Fee is to be charged, this fee is paid to AVALON by the product provider for the duration that your investment and/or risk insurance product is held with the product provider.

If it is legally possible to pass on an ongoing product fee to your adviser, it will be passed on to them without any split of this fee with AVALON.

The table below outlines the range of ongoing legacy fees your adviser **may** receive via AVALON in respect of various types of legacy investment and/or risk insurance products offered.

Product	Ongoing Fee Range
Superannuation	0 to 1%
Annuities	0 to 1%
Managed Investments	0 to 1%
Other Investment Products (e.g. Investment Bonds)	0 to 1%
Risk Insurance	0 to 35%

You should ask your adviser whether you have any of these legacy products having these type of fees being paid.

Referred Clients

Should you be referred to your adviser by a third party, (e.g. an Accountant), the third party may receive a fee, commission or other benefit for that referral.

This fee comes out of the fees received by your adviser and does not represent an additional cost to you.

You will receive more detailed information concerning any referral fee or commission in your SoA.

Broker fees

AVALON may receive a payment from a share broker for an Initial Public Offer or some other listed product through a foreign exchange. AVALON may pass these on to the adviser if it is possible to do so under the law.

All fees are described in the SoA provided to you.

Related Parties

From time to time your adviser may make a recommendation in relation to a Separately Managed Account managed by PacReef Asset Management Pty Ltd AFSL: 488045 (PacReef) which is a fund manager) and issued by HUB24. AVALON Directors, staff and advisers may own shares in PacReef and therefore may receive dividends and consulting fees from PacReef.

Advisers are prohibited by law from receiving conflicted remuneration IE commissions or ongoing commissions or volume bonus from any companies, including PacReef.

PacReef **does** provide AVALON with sponsorship funds in order that AVALON is able to run development days and conferences.

Active Sponsors

AVALON may also receive a sponsorship monies or other benefits from other product providers in return for AVALON granting rights such as being recognised as a sponsor and the right to promote their product or platform and give presentations at AVALON conferences or at professional development days.

This does not preclude other product issuers from coming to these events or discussing their products with our advisers.

Recent other sponsors have included CommInsure, ING and HUB24.

Sponsorship monies do not form part of the profits or earnings of AVALON and are used solely for professional development and in some cases research and IT support for the advisers.

Professional Development Conference Sponsorship

As previously stated, AVALON may receive conference sponsorships from some of its product providers.

Fees associated with these sponsorships help AVALON offset the organisational and running costs of its conferences and serve as a valuable education and training tool for our Advisers.

Any and all sponsorships are recorded within AVALON's Gifts and Benefits Register.

Adviser Incentives

Neither AVALON or its adviser receive any product based volume bonus commissions or incentives based on funds under management. This type of remuneration is defined as 'conflicted' and is not acceptable under the Corporations Act as defined in Regulatory Guide RG 246.

Alternative Remuneration

In accordance with industry requirements, and as outlined in the Investment & Financial Services Association (IFSA) and as required by the Corporations Act and Regulatory Guides issued by ASIC from time to time, AVALON and your adviser maintains a Gifts and Benefits Register.

This register is governed by the AVALON Gifts and Benefits Policy which must be adhered to at all times.

The Register contains information about any alternative forms of payments or soft dollar benefits over \$300 that may be received, (e.g. lunches, gifts, tickets to events and conferences).

If you wish to inspect the Gifts and Benefits Register, please ask your adviser or contact our Head Office. As of the date of this FSG, no such gifts or benefits have been received by AVALON or its advisers.

What information does AVALON maintain in your file and can you examine the file?

Your adviser must maintain a physical and electronic record of your personal information, which includes details of your relevant personal circumstances. They will also maintain records of any advice/recommendations made to you in the course of taking instructions from you, as well as any SoA, or other relevant advice document they have provided to you.

Can you provide your adviser with instructions about how you wish to buy or sell financial products?

Yes. If you require a specific product or execution of a trade your adviser is able to do this for you. Generally you need to provide your instructions to your adviser in writing, email or by electronic means. You should retain a copy of these instructions.

How does AVALON deal with the Anti-Money Laundering/Counter-Terrorism Financing Act 2006 as amended (AML/CTF Act)?

AVALON has an obligation under the AML/CTF Act to verify your identity before any financial products and/or services can be provided to you. AVALON does this as an agent for the relevant product suppliers.

Please read the section Privacy Considerations and visit our website for a copy of our privacy policy.

Documentation you will need to present to satisfy the customer identification requirements of the AML/CTF Act.

Privacy considerations

AVALON is committed to ensuring your privacy and security are protected through our Privacy Policy. A copy of the Privacy Policy is available from your adviser and on the AVALON website: <http://www.avalonfs.com.au/>.

The Privacy Policy can be found at the bottom of this webpage.

What Products can my adviser recommend?

Subject to having the appropriate authorisations as detailed specifically for your adviser at the back of this FSG and in their Certificate of Authorisations and any other prerequisites that apply, your adviser is able to recommend any product on the AVALON Approved Product List.

You may hold a product not on this list, AVALON advisers may keep this current arrangement although these must be disclosed in the new SoA with a note that this product is outside of the AVALON Approved Product List and was requested by the client.

Your adviser must disclose all relevant investment and/or risk insurance product remuneration relating to these product types including any other incentives derived from the advice and product recommendations within the SoA.

Complaints procedure

What should you do if you have a complaint?

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

1. Contact the Compliance Officer at AVALON to discuss your complaint. The Officer will acknowledge the complaint within 5 business days.
2. A response letter will be prepared and issued to you within 45 days detailing the complaint and advising you of your rights, any proposed solutions and further avenues should you not accept the resolution proposed.

If you are not fully satisfied with this response, you have the right to lodge a complaint with the Financial Ombudsman Service (FOS), which is an External Disputes Resolution Scheme of which AVALON is a member.

You are able to lodge a complaint with FOS directly online.

Additionally, the Australian Securities and Investments Commission (ASIC) has a freecall Infoline on 1300 300 630, which you may use to obtain information about any further rights you may have.

What compensation arrangements does AVALON have?

The Corporations Act 2001 (Cth) requires AVALON to operate a compensation arrangement which is designed to compensate retail clients for losses they suffer as a result of a breach by AVALON or its Advisers of the obligations outlined in Chapter 7 of the Corporations Act.

To this end, AVALON has comprehensive Professional Indemnity insurance in place which covers both AVALON and our Advisers (including the conduct of those Advisers who are no longer authorised by AVALON, but were so at the time of the advice).

These compensation arrangements meet the requirements specified by the Corporations Act and ASIC from time to time.

Pre-requisite to further advice

Where your adviser provides you with further and/or additional advice, an updated FSG will be provided where relevant.

Any questions?

Please contact your Adviser if you have any questions regarding this FSG or the investment and/or risk insurance products or services he/she provides.

This FSG should be retained by you in a safe place for future reference.

YOUR ADVISER AND THEIR AUTHORISATIONS

Your adviser is Greg Lucas whose company trades under the business name Acumen Advisers.

Both Greg Lucas and Acumen Advisers are authorised representatives of AVALONfs Pty Ltd.

Their authorised representative numbers, as issued by the Australian Securities and Investments Commission (ASIC), are 242268 for Greg Lucas and 328911 for Acumadvice Pty Ltd ATF The Acumen Advisers Trust trading as Acumen Advisers.

Taxation Practitioners Board (TPB)

AVALON is a Registered Member of the TPB. However, AVALON does not provide taxation advice and you should seek independent taxation advice from a taxation specialist (Refer Page 4 this document).

Your adviser is registered with the TPB. Number: 25015150

AUTHORISATION STATEMENT

Greg Lucas is authorised to provide you with advice and deal in the following areas:

- Basic and non-basic deposit products;
- Deposit products other than basic deposit products;
- Government Debentures, Stocks or Bonds;
- Life products including;
 - Investment life insurance products
 - Life risk insurance products such as term life, TPD, trauma and income protection
- Interests in managed investment schemes including Investor directed portfolio services;
- Securities;
- Superannuation all products including Self-Managed Superannuation Funds and (RSA's);
- Margin Lending.

YOUR ADVISER'S EXPERIENCE AND QUALIFICATIONS

Greg graduated from Bond University in 1992 with a Bachelor of Commerce, specialising in Marketing and Real Estate Development. On completion of his MBA at Griffith University, he was admitted to the Director's List in recognition of outstanding academic achievement. He formed Acumen Advisers (then known as Lucas Consulting Group) in 1997 as his parents were retiring and they had difficulty in finding an adviser who concentrated on strategy over product. In 2004 he graduated from the Financial Planning Association's Certified Financial Planner (CFP) course. Greg is a regular lecturer in Financial Planning for Community Colleges throughout the Blue Mountains and Sydney, and for a number of public and private companies. Greg has been a director of Korowal School since 2010 and has been the Chairman since 2011. He acts in these roles in an honorary capacity.

Greg holds the following qualifications:

Bachelor Commerce

Master of Business Administration

Certified Financial Planner

Greg is a member of the Financial Planning Association.

CONTACT Your Adviser	
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