



## Financial Services Guide (FSG)

**of CS Financial Planning Pty Ltd  
(Authorised Representative No: 329088)  
Trading as CS Capital Group**

2021/2 June 2021.

### **The purpose of this guide**

This guide is designed to assist you in understanding how we can help you achieve your financial and lifestyle goals by explaining:

- The advice and services we can provide to you either directly or in association with other professionals,
- Our fees and charges,
- The influences and arrangements that you need to consider when assessing our recommendations, and
- How best to raise any issues you may have with our advice or services.

This is a very important document and we recommend that you read it carefully. If you need further explanation or you are unsure about any part of this guide we encourage you to ask us any questions you may have.

Advocate Advisory has approved this document and authorised us to provide it on their behalf.

### **Not Independent**

Under s.923A of the Corporations Act, neither MCL Financial Services nor Advocate Advisory can utilise the terms 'independent', 'unbiased' or 'impartial' to describe our advice services or business. This is because we may receive commissions in relation to the sale of life risk insurance products that are not rebated in full to clients.

### **CS Financial Planning Pty Ltd T/A CS Capital Group**

108 Watton Street, WERRIBEE VIC 3030  
PO Box 2003, WERRIBEE VIC 3030  
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## **We maintain information about you**

The following statement contains important information about the records that will be made of the services that we provide you, as well as the privacy and confidentiality arrangements applicable to you.

### **Advocate Advisory Privacy Statement**

In order to continue to provide you with advice that is appropriate for your needs and suitable for your circumstances we will retain information about you including your financial and lifestyle objectives and your current financial situation. We are also legally required to store this information and records of any advice and services we provide to you. Failure to provide your relevant personal information may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice or financial service we give to you

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information.

For example, in addition to obtaining personal information from you, whenever you acquire a new product or service via us, we will need to obtain certain documentary evidence from you as to your identity to ensure compliance with AML/CTF laws. Such evidence may include for example a certified copy of your driver's licence, passport or birth certificate.

We will not use or disclose client information (including to a third party) for any purpose other than providing financial advice and tax (financial) advice unless you have specifically agreed to the disclosure, or the law requires us to do so. For example, we will, from time to time, disclose information about you to professionals, insurance providers, superannuation trustees, product issuers and our service providers in connection with providing our services to you. If your Adviser leaves Advocate Advisory and commences to provide financial services under another licensee, your information may be transferred to the new licensee. You will be advised of any such transfer prior to it taking place. We will not disclose your personal information to overseas recipients.

We are committed to maintaining the security, currency and confidentiality of this information and if you wish to examine your records or amend any information that we hold on you, we can make arrangements for you to do so. Details of how you may request access to your information or seek correction of information is contained within our Advocate Advisory Privacy Policy. The Privacy Policy also contains information on how you may make a complaint if you feel that there has been a breach of Australian Privacy Principles. For a full copy of our Privacy Policy, free, please contact the Privacy Officer. We can provide the Privacy Policy to you either electronically or in hard copy, and at no charge.

Advocate Advisory  
Privacy Officer  
Stephen@advocateadvisory.com.au

PO Box 6167  
Wantirna LPO Vic 3152

PH: 1300 040 978

## Our Services

We provide financial advice and services as authorised representatives of Advocate Advisory Pty Ltd ABN 14 150 153 503 (Australian Financial Services Licence 405576). We also provide tax (financial) advice as a Registered Tax (Financial) Adviser under Advocate Advisory. Advocate Advisory is a registered tax (financial) adviser with the Tax Practitioners Board and in accordance with the Tax Agents Services Act 2009. We act on behalf of Advocate Advisory and, as the authorising Licensee, Advocate Advisory is responsible for the financial services we provide to you.

As an authorised representative of Advocate Advisory we can provide you with services including

Financial Planning Advice, wealth creation and retirement income strategies, personal risk management advice, lifestyle planning, as well as advice on estate planning, redundancies, inheritances and social security. We can also assist with the management of your investments and superannuation.

We can also provide you with advice and support on a range of financial products such as:

Savings Plans and cash management accounts; Personal Superannuation plans; Employer Sponsored Superannuation funds; Rollovers; Retirement income products including annuities, allocated pensions and account based pensions; Life Insurance cover including, Trauma Insurance, Total & Permanent Disablement Insurance and Income Protection Insurance; Business Expense Insurance; Self Managed Super Funds; Managed Funds, Exchange Traded Funds plus other Managed Investments and Listed Shares.

As a registered tax (financial) adviser, we can provide tax advice related to your financial products. For comprehensive taxation advice you should seek advice from your taxation specialist or accountant.

Specific information on your adviser, their experience and specialisation is provided in Part Two of this guide titled "Adviser Profile".

## We can act on your instructions

After you engage us as your adviser we can act on your instructions whether you provide them by telephone, email, fax or other means of communication.

## Important documents you can expect to receive

If we provide you with personal financial planning advice, we will confirm our recommendations in writing so that you can make an informed decision about the appropriateness and suitability of our advice. Our recommendations can be documented in a Statement of Advice (SoA). A Record of Advice (RoA) may be used to record our advice to you where we have provided you with subsequent advice and your personal circumstances have not changed. The RoA may be provided to you or added to your file and if you would like a copy of this document, or our initial SoA, we will make it available to you on request.

Where we recommend specific financial products to you, we will provide you with a Product Disclosure Statement (PDS) which contains specific and important information on the financial product. It is very important for you to read and understand the PDS which must be provided to you before you can take any action in relation to a financial product recommended.

## The interests, associations and relationships that may influence or affect our advice.

Advocate Advisory is owned and run by its authorised representatives, and has no ownership associations with any product providers. Our recommendations to you will be based on our assessment of your personal circumstances, needs and objectives. Under the Financial Planners and Advisers Code of Ethics, we cannot advise, refer or act in any other manner where we assess that a conflict of interest or duty exists between ourselves and a client. Where we identify a conflict of interest created by an interest, association or relationship applicable to your situation, we will explain this to you, and advise you that we cannot act on your behalf accordingly.

## How you pay for our services

In many cases you are able to negotiate with your adviser as to how to pay for the professional services to be provided to you. You may choose to pay our fees directly or have our professional costs paid to us by the product provider or from the products we've recommended to you. We are remunerated by means of the fees and/or commissions payable by you for our services. The remuneration we receive will be clearly disclosed in the advice documents we provide to you. We may also receive additional commission or other benefits from product providers. These will also be disclosed to you within any advice provided (as well as detailed in the attached Adviser Profile).

Please refer to the Adviser Profile for specific information on the fees and/or commission that you may be charged for the provision of financial services by your Adviser. All fees and/or commission payable is payable to your adviser as remuneration for the provision of financial services to you.

## Make a complaint Feedback or complaints about our services

Advocate Advisory is a member of the Australian Financial Complaints Authority Limited ("AFCA").

As a professional financial services business, we are committed to acting efficiently, honestly and fairly. Your adviser is bound by the Financial Planners and Advisers Code of Ethics, and is committed to the ethical standards dictated by this Code. In addition, as a registered tax (financial) adviser with the Tax Practitioners Board, Advocate Advisory is also bound by the Tax Practitioners Board Code of Professional Conduct. We value your support and appreciate any feedback that will help us to meet your expectations and needs. If at any time should you have any concerns or complaints about our advice or our service we encourage you to contact us directly and we will try to resolve the issue immediately.

If we can't respond to your feedback or effectively resolve your issues within three (3) business days – or if you don't feel comfortable talking with us about your issues - you should contact the Complaints Manager on 1300 040 978 or send your complaint to:

### The Complaints Manager

Advocate Advisory Pty Ltd

PO Box 6167 Wantirna LPO Vic 3152

If Advocate Advisory doesn't provide you with a satisfactory response, you have the right to refer your concerns to AFCA. AFCA is an independent dispute resolution service that deals with complaints about financial services including banking, credit, loans, general insurance, life insurance, financial planning, investments, stock broking, managed funds and pooled superannuation trusts.

AFCA can be contacted at "Australian Financial Complaints Authority Limited, GPO Box 3, Melbourne VIC 3001. You can also contact AFCA by free call on 1800 931 678. Alternatively, you can go to the AFCA website at [www.afca.org.au](http://www.afca.org.au). If you wish to progress your complaint, you can complete the online complaints form, or alternatively, you can download a form and send it to the above address or email at [info@afca.org.au](mailto:info@afca.org.au) .

If you have a complaint relating to tax (financial) advice services that your adviser has provided or if you feel that your adviser has breached the Tax Practitioners Board Code of Professional Conduct, and Advocate Advisory cannot provide you with a satisfactory response to your complaint, then you can make a complaint to the Tax Practitioners Board via [www.tpb.gov.au](http://www.tpb.gov.au). The Australian Securities and Investment Commission (ASIC) also has a Freecall Infoline on 1300 300 630 which you may use to make a complaint and obtain more information about your rights. It is a condition of our Australian Financial Services Licence and our registration as a tax (financial) adviser, that Advocate Advisory maintain a level of Professional Indemnity Insurance appropriate for its size and the scale and complexity of its operations. Advocate Advisory insurance covers claims made against Advocate Advisory and their authorised representatives, including those representatives who no longer work for Advocate Advisory but did so at the time of the relevant conduct, and it is annually reviewed for currency and suitability.

## Contacting Advocate Advisory:

Advocate Advisory Pty Ltd

[Stephen@advocateadvisory.com.au](mailto:Stephen@advocateadvisory.com.au)

PO Box 6167, Wantirna LPO Vic 3152

Ph 1300 040 978

### **Your Adviser is Andrew Bowring ASIC Authorised Representative No: 242241.**

Andrew is employed by CS Financial Planning Pty Ltd, ABN 85 088 403 990, Authorised Representative No 242241. Both Andrew and CS Financial Planning are authorised representatives of Advocate Advisory Pty Ltd.

### **Qualifications and Experience**

Andrew has a Diploma of Financial Planning [Dip FP] from Deakin University and a Bachelor of Economics from Sydney University.

Andrew has worked in the Financial Services industry for over 30 years, in both management and adviser roles.

### **Our Financial Planning and Advice services**

Andrew Bowring is authorised to provide advice and deal in the following specific products:

- Cash Management Accounts
- Managed Investments, including Investor Directed Portfolio Services (IDPS) and Managed Discretionary Funds (MDA's)
- Superannuation including Public Offer and Self-Managed Funds
- Retirement income products including annuities, allocated pensions and account-based pensions
- Life Insurance cover including, Trauma Insurance, Total & Permanent Disablement Insurance plus Income Protection & Business Expense Insurance
- Listed Shares including Exchange Traded Funds and Derivatives listed on the ASX including margin lending products

As a tax (financial) adviser under the Tax Agents Services Act 2009, Andrew Bowring can also provide you with tax advice relating to financial products. For comprehensive taxation advice, you should refer to your taxation specialist or accountant.

CS Capital Group offer a range of advice services including:

- Retirement Planning
- Personal Risk Management advice
- Wealth creation strategies and lifestyle planning
- Superannuation investment & Personal investment portfolio advice
- Advice on estate planning, redundancies, inheritances and social security.

We can also assist with the management of your investments and superannuation.

We can offer you comprehensive advice, or advice on a specific matter. The scope and nature of our advice services will be determined with your adviser based on what is appropriate to your specific needs, circumstances and objectives, and what is in your best interest.

We will gain your agreement on the scope of advice services to be provided prior to preparing our recommendations to you within a Statement of Advice

## Our Ongoing Service to you

The table below outlines the specific services we provide:

### **Peace of Mind Service**

- Trusted Qualified Adviser who pro-actively contacts me
- An ongoing, continuous relationship (my adviser knows me, my concerns, my challenges and my needs)
- On demand availability (my adviser will be there for me in a personal or financial crisis be it planned or unplanned)
- Short and long term goals always in focus
- Ordering my affairs so I live a life of my choosing

### **Physical Action Service**

- Semi-Annual goal and strategy Meetings
- Direct Share Advice and Execution
- Group Structure Management and Administration
- Ongoing Management (oversight) of Insurances, Estate Planning, Taxation & Debt
- Responding via Phone Calls, Emails, Letters
- Additional Meetings and Quarterly Reporting
- Regular Video Updates
- General Administrative Tasks

### **Additional Services at No Additional Charge**

- Multiple cascading tax structure advice and review of complex agreements
- Level of Client Complexity/Dependency on Firm
- Unique Circumstances where Premiums/Discounts are warranted
- Intergenerational advice across family members
- Philanthropic and charitable structures to enable a giving back to community

## Our financial planning process

The following is a summary of the process that we will go through with you in order to develop, and maintain, a financial plan suited to your individual needs, circumstances and goals.

<b>Initial Consultation</b>	<p>A free, no obligation discussion with you to discuss your needs for advice, and how we can assist you to meet your financial and lifestyle objectives.</p> <p>During this discussion we will also explain our services and fee structure to you.</p>
<b>Discovery Process</b>	<p>In order to provide you with advice that is appropriate to your individual circumstances, we need to collect personal and financial information from you.</p> <p>To do this, we will ask you to complete some forms, including a Client Data Collection Form and a Client Risk Profile Questionnaire.</p> <p>We may also ask for other documentation such as superannuation statements, bank statements, etc.</p> <p>Your adviser will assist you through this process.</p>
<b>Determining your financial and lifestyle goals</b>	<p>Once we have gathered sufficient information about you we can determine what your specific advice needs and objectives are.</p> <p>We will consider both your immediate financial needs, as well as your future goals and requirements, giving priority to those matters that are most important to you.</p>
<b>Engagement to Proceed</b>	<p>At this point, we will provide you with our Terms of Engagement. This will detail our understanding of your advice requirements, the specific services we propose to provide to meet those requirements, and how much it will cost you.</p>
<b>Developing and Delivering your Financial Plan</b>	<p>We will prepare our advice recommendations to you within a "Statement of Advice". This document will provide you with detailed information on the strategies and products that we recommend to assist you to meet your goals and objectives.</p> <p>We will present this to you, typically face to face so that we can answer any questions you may have. We will give you time to consider our recommendations and will only proceed once we are sure that you understand and agree to our advice recommendations.</p>
<b>Implementation of our recommendations</b>	<p>Once you have agreed to our recommendations and provided all relevant authorities to proceed, we will then implement our recommendations. This includes handling all fund and policy administration on your behalf, liaising with product and platform providers and other professional advisers as appropriate.</p>
<b>Ongoing Review and management</b>	<p>As part of our financial planning process, we provide ongoing advice services to ensure that the recommendations that we provide remain appropriate to you over time, and as circumstances change.</p> <p>We will ask you to agree to an appropriate ongoing advice service when we present your financial plan.</p> <p>Your Ongoing Advice Arrangement will run for a period of 12 months, at which time we will ask you if you wish to renew for the coming 12 months.</p>

**We will always agree the level of our charges and your payment options before proceeding with any work. Our Terms of Engagement will confirm the fee and specific services to be provided.**

**We will not charge you until you have agreed how we are to be remunerated.**

## How we will provide advice to you

We will document your financial plan within a document entitled a 'Statement of Advice'. The Statement of Advice will detail:

- A summary of your current situation, including your financial and lifestyle goals
- Our financial product, and strategic recommendations to you
- Information about how each of our recommendations will put you in the best position to achieve your financial and lifestyle goals
- Information on risks, costs and benefits associated with our recommendations
- Our Ongoing Service offering – detailing how we will work with you ongoing to ensure your financial plan remains appropriate
- Details about our advice fees – including Statement of Advice and Ongoing Review fees as applicable
- An “Authority to Proceed” confirming your agreement to proceed with our recommendations, and your Ongoing Review Service.

## Costs of Advice

Our charge for the preparation of a Statement of Advice ranges from \$0 to \$2,200 dependent on the complexity and scope of the advice provided.

This fee covers the preparation of the financial plan detailed in the Statement of Advice, all relevant meetings and discussions in relation to the Statement of Advice, and the implementation of recommendations, including administration, e.g. lodgment of forms with product providers, etc.

This fee is payable upon presentation of the Statement of Advice. We may choose to waive this fee where you proceed with recommendations contained within the Statement of Advice.

## Risk Insurance commissions

Where we recommend risk insurance products to you, rather than charging a fee for service, we will receive commissions directly from the insurance company. These commissions are paid from the product costs and are not an additional cost incurred by you. The commission payable will depend on the product recommended, and on the amount of the premium paid or amount invested.

Initial or up-front commissions will be paid to us by the insurance company when your policy is implemented. The amount of commission payable will range from 0%-60% of the premium paid.

Ongoing commissions will be paid to us on a yearly basis on the anniversary of your policy and will range from 0%-20% of the premium paid.

## Ongoing Review Service

CS Capital Group offers a comprehensive Ongoing Review Service. This service allows us to make sure that you stay on track to meet your financial and lifestyle goals and requirements.

The Ongoing Review Service includes the following:

- Annual Review of your Financial Plan
- Access to your adviser, including for ad-hoc phone, email queries and face to face meetings
- Investment portfolio review–At least once per year
- Liaison with product providers and other relevant professionals i.e. accountants, solicitors for administrative services
- Liaison with Centrelink or DVA for Pension entitlements
- SMSF Investment Strategy Annual Review



## Annual Review of your Financial Plan

As part of the Ongoing Review Service, each year we will review your Financial Plan and make any changes to investments or strategies as required to ensure that your Plan remains appropriate to you, particularly as your circumstances change over time.

At your financial review we will:

- Review your current circumstances and objectives to see if there has been any changes
- Review the continuing suitability of your financial plan
- Review your investment or superannuation portfolio(s) and the performance of the underlying assets
- Review of any taxation or legislative changes that may affect your financial plan
- Make recommendations for any changes to investments or strategy as required
- Implement any agreed changes to your financial plan

## Fees for Ongoing Review Service

We will charge an Ongoing Review Fee of 1.1% of the money that you invest with us. This will be calculated on a per annum basis and charged monthly with a minimum fee of \$3,000 per annum to apply.

Ongoing Review fees may be deducted from your investment funds and paid to us by the product providers instead of being invoiced directly to you.

If you require any other services that are outside of your Ongoing Review Service, then we can negotiate a cost for these services based on our hourly rate of \$275. We will not charge you until you have agreed to the service and associated costs.

**The method of calculation of your Ongoing Review Fee, and the fee as a dollar amount will be detailed within the Statement of Advice. We will also provide an estimate of the fee prior to proceeding with the Statement of Advice.**

**We will not charge you an ongoing fee until you have agreed (in writing) to proceed with the Ongoing Review Service. We will also seek your consent to deduct fees from your investment where relevant.**

## Referrals to other providers

We may refer you to other professionals such as accountants or solicitors if you require advice in these areas. We will not receive any fees or benefits for these referrals, nor do we have any ownership links with any referral parties.

Where other professionals refer individuals to us for financial advice, we do not pay them a referral fee.

Please note that CS Capital Group engages contractors located in India to undertake certain functions of providing you with financial advice. As a result your personal information will be shared with our contractors. It is important to note the following:

1. The entity in India that has access to your personal information will not be accountable under the Privacy Act 1988, and
2. If there is a breach of privacy you will not be able to seek redress under the Privacy Act, and
3. The overseas recipient is subject to foreign law that could compel the disclosure of personal information to a third party such as an overseas authority.

CS Capital Group will at all times respect your privacy and adhere to the Privacy Laws of Australia.

### CS Financial Planning Pty Ltd T/A CS Capital Group

108 Watton Street, WERRIBEE VIC 3030  
PO Box 2003, WERRIBEE VIC 3030  
Ph [03] 9974 8333  
E: andrew@cscapitalgroup.com.au

**Important Notice: This Adviser Profile must be accompanied with an approved Financial Services Guide issued by the Licensee Advocate Advisory Pty Ltd AFSL 405576.**

## FSG acknowledgment

I/We confirm that I / we have received a copy of the Advocate Advisory Pty Ltd Financial Services Guide (FSG) Version 2021/2 June 2021.

I/We confirm that I/we have had the opportunity to read through the FSG, and that my adviser has drawn my attention to the following information:

- My adviser is authorised to provide me with financial advice as an authorised representative of Advocate Advisory, Australian Financial Services Licence No. 405576.
- Information on the products and services that my adviser is authorised to provide me
- Details of the types of advice services available to me and the relevant fees associated with these services
- Advocate Advisory's Privacy Statement – in particular, information about what records will be maintained of my personal information, and the privacy and confidentiality arrangements applicable to my personal records.
- How I can make a complaint if I have any issues with the services that I receive from my adviser.

## Privacy Consent

I/We have read and understood the Privacy Disclosure Statement within the FSG.

I/we agree to the collection, use, disclosure and storage of my/our personal information in accordance with the Privacy Disclosure Statement.

I/we accept that my adviser may send me/us information about its services from time to time. I/we understand that I/ we may notify you of my/our decision not to receive further information by contacting you directly

Client name 1 \_\_\_\_\_

Client Signature \_\_\_\_\_ Date \_\_\_ / \_\_\_ / \_\_\_

Client name 2 \_\_\_\_\_

Client Signature \_\_\_\_\_ Date \_\_\_ / \_\_\_ / \_\_\_

### OFFICE USE ONLY

Format of receipt of FSG:

In person      Provided on:      \_\_\_ / \_\_\_ / \_\_\_

Email            Sent on:            \_\_\_ / \_\_\_ / \_\_\_

Mail             Mailed on:        \_\_\_ / \_\_\_ / \_\_\_