

The purpose of this Financial Services Guide (FSG) is to assist you in deciding whether to use any of the financial services we offer. This guide contains the following:

- Who we are;
- What financial services and products we provide;
- Details on how to get advice and give instructions;
- How we (and any relevant persons) maybe remunerated;
- Whether any relevant associates or relationships exist that may influence our advice;
- How we protect your personal information and
- How to access our internal and external compliant handling arrangements.

## About us

Scarlett Wealth Pty Ltd (Scarlett Wealth) is the Trustee for Scarlett Wealth Unit Trust (ABN 16 459 537 343). Scarlett Wealth Pty Ltd is a Corporate Authorised Representative (CAR), number 001240847 of SIRA Group Pty Ltd (SIRA Group) ABN 15 106 922 641 which is an Australian Financial Services Licensee (AFSL), number 278423. In this document, Scarlett Wealth is the providing entity and is referred to as 'we', 'us' and 'our.' Our contact details are:

Scarlett Wealth:

Street Address: Level 3 South Tower  
527 Gregory Terrace  
Fortitude Valley QLD 4006  
Level 2, 28 Ainslie Place  
Canberra City ACT 2601

Postal Address: PO Box 559  
Spring Hill QLD 4004

Phone: 1300 678 681

Email: [contact@scarlettfinancial.com.au](mailto:contact@scarlettfinancial.com.au)

SIRA Group, under its AFSL, authorises representatives (known as ARs) to carry on their business within the provisions of authorised financial services.

SIRA Group's contact details are:

Level 1, 530 Little Collins Street  
Melbourne Vic 3000  
[info@siragroup.com.au](mailto:info@siragroup.com.au)

SIRA Group have authorised the distribution of this FSG by Scarlett Wealth.

Scarlett Wealth was established in 2016 to provide professional and proactive financial advice to clients. Scarlett Wealth clients take control of their financial

position, and have a clear strategic plan to build wealth and maximise their lifestyle.

Scarlett Wealth consists of a team of the highest skilled financial advisers, analysts, and client service managers from within the financial planning industry.

When meeting with us you may receive two types of advice, general advice and/or personal advice.

When you receive personal advice, you will receive a Statement of Advice (SoA). An SoA will:

- explain the advice and the basis of the advice provided;
- provide information about remuneration (including commissions) and;
- disclose any associations or relationships that could potentially influence us or your financial adviser, in providing that advice.

If you received further advice, you may also receive a Record of Advice (RoA). Copies of all advice documents will be kept on record and you may request a copy of these records at any time during the seven-year period after the date the SoA or further advice was provided by contacting your adviser.

General advice is based on the consideration of the investment merits of a product without taking into consideration whether the product is suitable for you personally. Such advice will be accompanied by a general advice warning referring to this.

## Statement of Lack of Independence

Scarlett Wealth Pty Limited is not an independent financial planning firm as defined in the Corporations Act 2001 due to the following:

We receive commissions from insurance providers when writing business with them;

Our financial planning fees are calculated based on a % of the funds we manage for you; and

Other Corporate Authorised Representatives of SIRA Group receive either commissions from insurance providers or charge fees based on a % of the funds under their management.

## Financial Services and Products that we offer

Scarlett Wealth is authorised to provide advice on and deal in the following financial products:

- Deposit and payment products limited to:
  - Basic deposit products
  - Deposit products other than basic deposit products
- Securities
- Interest in managed investment schemes including IDPS
- Retirement savings account
- Government bonds and debentures
- Life products including investment life insurance products and life risk insurance products
- Superannuation
- Standard margin lending facility

We can only provide advice on financial products that are on our approved product lists which includes a large range of investments and insurance products for which appropriate research and analysis has been carried out.

SIRA Group's Authorised Representatives cannot advise you on, or influence you in favour of, a financial product which:

- is not on the approved product list, or
- any arrangement where your financial adviser can make changes to your portfolio before obtaining your consent unless they are specifically authorised to do so, or
- is a product on which they are not authorised to provide advice.

You can find further details on the Australian Securities and Investment Commissions website at [www.asic.gov.au](http://www.asic.gov.au).

Whilst your financial adviser may conduct a separate business, for example as an Accountant, we are only responsible for the financial products and services described in this FSG and included on our approved product list.

Should you have a need for products or services which are not listed above or require further specialist advice which we cannot, or are not authorised to provide, we will refer you to another qualified provider.

In the case of where you do not wish to receive our advice, we may deal on your behalf by carrying out your instructions.

Where you do not obtain advice, you may face the risk that the financial product/s and or service you select may not fully take into account your objectives, financial situation and or needs. In such instances, we may require you to sign a document that records your intention not to seek advice from us for the particular financial products/s.

## Submitting instructions to your financial adviser

You will be permitted to exercise rights in relation to the assets in the client portfolio. Instructions can be provided to your financial adviser by letter, email, telephone, or other means as mutually agreed.

## Outsourcing Arrangements

Where we outsource tasks associated with the implementation or management of your services such as to Executing Brokers, we will ensure that due skill and care is taken in choosing suitable service providers by, executing Service Agreements to monitor the service levels and to review the ongoing performance of these outsourced functions.

## Non-Limited Recourse Products

Scarlett Wealth is authorised to provide financial services in relation to standard margin lending facilities.

### Products

Types of products include Margin Loans, Protected Equity Loans and Instalment Warrants. Providers of these products include Commonwealth Bank, Macquarie Bank and Bell Potter.

### Leverage

Margin loans will be limited to a maximum LVR of 50%.

## Remuneration

### DID YOU KNOW?

Small differences in both investment performance and fees and costs can have a substantial impact on your long term returns?

For example, total annual fees and costs of 2.0% of your account balances rather than 1.0% could reduce your final return by up to 20% over a 30 year period (for example, reduce it from \$100,000 to \$80,000).

You should consider whether features such as superior investment performance or the provision of better member services justify higher fees and costs. Your employer may be able to negotiate to pay lower administrative fees.

Ask the fund or your financial adviser.

### TO FIND OUT MORE

If you would like to find out more, or see the impact of fees based on your own circumstances see the ASIC Money Smart website ([www.moneysmart.gov.au](http://www.moneysmart.gov.au)) has a Managed Investment fee calculator to help you check out the different fee options.

## Fees and other costs

This document shows fees and other costs that you may be charged. These fees and costs may be deducted from your money, from the returns on your investment or from the assets of the Managed Investment Scheme as a whole.

Taxes and Insurance costs are set out in a separate part of this document.

### **Initial Financial Advice Fee:**

You may be charged an upfront financial planning service fee based on either

- The complexity of the strategies and advice,;

- time spent preparing your SoA (or other advice document); or
- the value of the funds you choose to invest.

This fee will be a flat fee and may be invoiced or paid through a product depending on your preference. The agreed fee will be payable when you are provided with your SoA or another advice document.

Our initial advice fees can range from \$1,650 to \$11,000.

### **Ongoing Financial Advice Fee:**

You may enter into an Ongoing Service Agreement with us. The agreement is an arrangement that may cover items such as ongoing portfolio management, review meetings and reports, investment administration and unlimited contact with your financial adviser. You and your financial adviser should discuss the services to be included and the fee that you will pay either before, or at the time, you are presented with your SoA.

Your advice documents will contain full details of any fees and charges that are payable.

Any of these payments listed above will be charged by us as agreed with you or as permitted by law.

Our ongoing advice fees can range from \$1,100 to \$33,000 per annum.

If the remuneration (including commissions) or other benefits are calculatable at the time we give you the personal advice, it will be disclosed to you at the time it is given or as soon as practicable after that time. If the remuneration (including commissions) or other benefit cannot be calculated at the time we provide you with personal advice, it will be disclosed to you as soon as practicable.

You should read all the information about fees and costs

## Additional Explanation of Fees and Costs

### **Brokerage:**

You may be charged a fee for trading in any financial product. You may also be charged clearing interest, interest and administrative or related transaction costs such as off market transfer fees. This will be an additional cost to you.

### **Commissions:**

There may be either or both, an initial and/or ongoing commission payable to us. Please note that while the commissions are payable based on the premium you pay, the commissions do not form part of your premium and are not an additional fee to you.

If these products are recommended to you, more detail will be provided in the SoA.

### **Sponsorship:**

SIRA Group may be eligible to receive sponsorship in the form of cash payments from product providers listed on the approved product list. Amounts may vary per product provider.

Your financial adviser does not share directly in the sponsorship payments, but may benefit indirectly through the provision of subsidised conference and professional development training costs.

If you purchase or sell direct securities through us, we may receive a fee for these transactions. Details of which will be disclosed in either an SoA or an RoA.

Your financial adviser may be invited to attend social or sporting events and may receive an occasional gift such as a hamper on special occasions. These benefits will be less than \$300. Your financial adviser keeps a register of other benefits received with a value between \$100 & \$300.

These registers are available with 7 days written notice

Any of the payments listed above will be made to the extent permitted by law.

## **Who we act for**

We provide financial services on behalf of SIRA Group to you and will act in your best interests.

## **Relationships or Associations which may influence the financial advice provided**

Scarlett Wealth, including its shareholders, have no financial interest in any financial product providers with whom it deals with. No directors or executive officers of Scarlett Wealth, act in a similar capacity within the business of another financial product provider. In the event that we develop any relationship with financial product providers and receive any monetary or other benefits, our usual disclosure principles will apply.

## **SIRA Group's Professional Indemnity Insurance Arrangements**

SIRA Group has Professional Indemnity Insurance arrangements in place as required under section 912B of the Corporations Act. The professional indemnity insurance takes into account the volume and nature of its business, the number and nature of its

representatives and clients, and the potential extent of its liability. SIRA Group's professional indemnity insurance also covers potential claims in relation to the conduct of representatives who no longer work for them (but who did so at the time of the relevant conduct).

## **Information provided to receive Personal Advice**

In order to meet our obligation to act in your best interests (i.e. under the Best Interests Duty) we will request that you provide us with details of your personal objectives, current financial situation and needs and any other relevant information, so that we can offer you appropriate advice.

You have the right not to tell us information about yourself however if you do not provide us with accurate and complete information relating to your personal circumstances, the advice you receive may not meet your intended objectives and you should make your own determination as to whether the advice is appropriate, before proceeding.

## **Protecting your personal information**

Information provided by you in the course of receiving financial planning services will only be used to:

- provide you with information, products or services that you might reasonably expect or request;
- fully understand or anticipate your needs during our relationship or;
- manage rights and obligations under any laws applying to the services provided.

We are committed to implementing and promoting a Privacy Policy which will ensure the protection and security of your personal information.

We have provided you with our Privacy Policy. If you would like an additional copy please let us know.

If you wish to access your personal information, please contact our office and we will make arrangements for you to do so. Please notify us of any changes or discrepancies with your personal information.

Should you have any complaints regarding the collection, use or management of your personal information, you may write to the Privacy Commissioner at:  
GPO Box 5218  
Sydney NSW 1042

Your financial adviser has an obligation under the Anti-Money Laundering and Counter-Terrorism Finance Act 2006 to verify your identity and the source of any funds.

If your financial adviser leaves SIRA Group and starts to provide financial services under another licensee, your information may be transferred to the new licensee. You will be advised of any transfers before it takes place.

## How to lodge a complaint

If you have a complaint about a financial service provided to you, you should follow the steps outlined below:

1. Contact your financial adviser to discuss your complaint;
2. If your complaint is not satisfactorily resolved within seven days of raising it, you may contact SIRA Group on (03) 9909 7018 or put your complaint in writing and send it to:  
SIRA Group Pty Ltd  
Level 1, 530 Little Collins Street, Melbourne Vic 3000

If, after speaking with SIRA Group and your financial adviser, your complaint is still not resolved to your satisfaction, you can lodge your complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: [www.afca.org.au](http://www.afca.org.au) Email: [info@afca.org.au](mailto:info@afca.org.au)  
Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne VIC 3001.

SIRA Group is a member of this Complaints Resolution Service.

The Australian Securities and Investments Commission (ASIC) also has a toll free information line on 1300 300 630 which you may wish to use to make a complaint and obtain information about your rights.