

Financial Services Guide

A guide to our relationship with you and others

This Financial Services Guide

This Financial Services Guide (FSG) is issued by C&L Investwell Pty Ltd ABN 69 611 090 352 (Investwell) to inform you of the financial services that we can provide as a Corporate Authorised Representative (CAR No. 1240617) of Andika Pty Ltd ABN 41 117 403 326 (ANDIKA), who is the holder of an Australian Financial Services (AFS) Licence 297069.

It is designed to help you decide whether to use our services and to ensure that Investwell meets its obligations as a financial services provider.

This document contains important information about the financial services and types of products we offer. It also explains how we (and others) are remunerated, any potential conflict of interest as well as details of our internal and external dispute resolution procedures and how you can access them.

What other documents could you receive?

Should we provide you personalised financial advice, we may prepare a written report called a *Statement of Advice*. To ensure the financial advice provided is appropriate to you, we must make reasonable enquiries about your current financial situation and future needs.

The *Statement of Advice* will generally include:

- the advice
- the basis on which it is given
- information about replacement of financial products
- our fees and/or commissions
- any associations we have with Financial Product Issuers or other parties which may have influenced the advice we have given you.

If we provide you with further advice after we have given you a *Statement of Advice* and have not given you a Record of the *further Advice (ROA)*, you may request, either verbally or in writing, a record of the further advice at the time, or up to 7 years (or as prescribed by law) after receiving the advice.

You can, at any time, request us to provide you with a higher level of advice which is personalised to your particular circumstances, needs or objectives by completing the *Client financial information and risk profile form*.

If you provide a completed *Client financial information and risk profile form*, we will contact you to discuss your personal circumstances and then issue a *Statement of Advice (SOA)* to you which will essentially summarise our advice to you and the basis of our advice.

Should you elect not to complete the *Client financial information and risk profile form*, your adviser will only be able to provide you with **General Advice and Execution Only** advice service level.

Accordingly, you may instruct us to execute transactions on your behalf with or without any general advice provided by your adviser. Where your adviser does provide you with advice, it will be restricted to general factual market advice only and will not include any level of personal advice.

An “**Execution Only**” service involves a transaction or transactions where you instruct us to transact in a particular financial product or products. You will be provided with objective factual information at your request. All investment decision making including the product, volume, price and timing of the transaction will be directed by you. We will then execute these instructions on your behalf.

General Advice means that we are able to provide you with recommendations or opinions about financial products or strategies but we will not consider whether it is or might be appropriate for your particular personal circumstances, needs or objectives. Any advice provided to you will not be tailored specifically to you or consider your personal needs in any way and therefore you should, before acting on any of the advice that we provide you, consider the appropriateness of the advice having regard to your objectives, financial situation and needs.

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If we recommend that you acquire a particular Financial Product (other than listed shares) we will generally give you a *Product Disclosure Statement* that contains information about the particular Financial Product to help you make an informed decision.

Who is my adviser?

Your adviser is a director of Investwell.

Who is responsible for the financial services provided?

Investwell is responsible for the financial services described in this FSG, including the distribution of this FSG. You can contact us by:

Calling us on 0418 444 468
Emailing us at: chris@investwell.net.au
Visiting our website at www.clinvestwell.com
Writing to us at: 5 Florence Street
Norwood SA 5067

Investwell is authorised by ANDIKA to provide the financial services described in this FSG. You can contact ANDIKA by:

Calling on 0412 696 135
Visiting its website at www.andika.com.au
Writing to it at: PO BOX 1323
Coolangatta QLD 4225

Investwell and ANDIKA act on their own behalf when providing financial services under ANDIKA's AFS Licence.

Do you have any relationships or associations with financial product issuers?

Investwell is 100% privately owned by the director and does not act as a representative of any other AFS Licensee.

Clients of Investwell trade Securities and Derivatives via the ASX Participant, CMC Markets.

Are you or ANDIKA a participant in a licensed market or licensed clearing and settlement facility?

Neither Investwell or ANDIKA are a Trading & Clearing Participant licensed with the Australian Stock Exchange or any other licensed market or licensed clearing and settlement facility.

What kinds of financial services can Investwell offer, and what kinds of Financial Product/s do those services relate to?

Investwell provides personal and general advice and resources to help investors build a portfolio of investments that best suit their individual investment requirements. We offer:

- ASX market trading (*shares and options*)
- Investment strategies for individuals, under various different entity structures including Self-Managed Superannuation Funds (SMSF)
- Portfolio Administration

Investwell is authorised by ANDIKA to advise and deal in the following financial products for retail and wholesale clients:

- Basic Deposit Products (*Cash & Fixed Interest*)
- Securities (*shares and debentures*)
- Derivatives (*exchange traded options contracts and warrants*)
- Superannuation
- Managed Investment Schemes (*Managed funds and CMA's*)

Will you give me Personal Advice that is suitable to my particular needs and financial circumstances, and is your advice restricted in any way?

Subject to you completing the *Client financial information and risk profile form* your adviser can provide personalised advice only after considering its suitability to your personal objectives, financial situation and other relevant information.

Through Investwell you have access to a wide range of financial strategies and products that have been researched and approved by ANDIKA (our authorising AFS Licensee), including shares listed on the ASX, where there is a reasonable basis for the advice. If you do not wish to receive our advice, we may still deal on your behalf by carrying out your instructions.

Should your adviser be unable to provide you with the service or advice that you require, the adviser may refer you to another adviser.

Although your adviser will consider tax, social security and estate planning when preparing advice for you, your adviser is not a registered taxation agent or solicitor and any advice provided as a

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guide in these areas is general advice and incidental advice which should be confirmed with appropriately qualified persons or the relevant department.

What information should I provide to receive personalised advice?

You need to provide us with a list of your personal objectives, details of your current financial situation and any other relevant information, so that we can offer you the most appropriate advice possible.

You have the right not to provide us with the information, or limit the scope of the advice provided by your adviser, however the risk is that the advice you receive may not be appropriate to your needs, objectives and financial situation.

You should read any warnings contained in the Statement of Advice carefully before making any decision relating to a financial product/s and consider whether the advice is appropriate having regard to your specific investment objectives, financial situation and particular needs.

What information do you maintain in my file, and can I examine my file?

We maintain a record of your personal profile including details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information.

If you wish to examine your file, please ask us. We will make arrangements for you to do so.

How can I give you instructions about my Financial Product/s?

Generally, we rely on your signature for verification but for some financial products and services you may tell us how you would like to give us instructions - for example by telephone, text message or other means such as e-mail.

How will I pay for the services provided?

We will arrange for the ASX Participant through which you trade to charge brokerage for transactions of securities and options listed on the Australian Stock Exchange.

Either the Statement of Advice or the General Advice and Execution letter (as applicable to you) provided to you will contain details of the fees and any payments made to ANDIKA by a Financial Product issuer/s or the ASX Participant, as authorised by you. Your adviser will give the Statement of Advice or the General Advice and Execution letter to you if you are a retail client before we proceed to act on your instructions.

Investwell will receive a percentage of the fees received by ANDIKA, as authorised by you.

Fees & Brokerage (see Standard Fee Schedule on page 5)

- ASX Participants charge brokerage for transactions of securities and derivatives listed on the Australian Stock Exchange.
- Ongoing fees are calculated as a percentage of funds under management, charged quarterly.
- We may charge you a small incidental fee for the end of year reconciled accounting package we provide you for your end of financial year accounts.
- We will **not** charge you a fee for the initial time and setting up of your account including all the personal advice / compliance documentation.

Other Benefits

Product issuers may from time to time give Investwell other benefits (unquantifiable at this stage) and offer advisers non-monetary benefits of up to \$300 in value.

Adviser Remuneration

The ongoing fees that are payable to Investwell entitle the director to participate in the above remuneration by way of salary.

What should I do if I have a complaint?

1. Contact us on 0418 444 468 or by email at chris@investwell.net.au and tell us about your complaint.
2. If your complaint is not satisfactorily resolved within 20 days, please contact *The Compliance Manager* on 0412 696 135 or put your complaint in writing and send it to ANDIKA's head office mailing address noted at the beginning of this FSG. They will try to resolve your complaint quickly and fairly.

3. ANDIKA is a member of the Australian Financial Complaints Authority (AFCA) (Member Number **44139**). If the complaint cannot be resolved to your satisfaction, you have the right to refer the matter to the AFCA. They can be contacted on 1800 931 678.

AFCA follows the following process:

Stage 1 of the AFCA process is where AFCA facilitates discussions and negotiations between the parties.

Stage 2 is conciliation and the parties come face to face with a conciliator from AFCA. The role of the conciliator is to assist the parties to explore options for settlement of the dispute and to help parties to agree on their own outcome.

Stage 3 is where the independent adjudicator is requested to make a decision "on the papers", taking into account the relevant law, fairness and reasonableness. If you accept the adjudicator's decision, it is binding on the member.

ANDIKA as the authorising licensee holds Professional Indemnity Insurance which complies with Regulatory Guide RG 126 and covers the activities of all representatives who have in the past and are currently operating under ANDIKA's AFS Licence.

Privacy Policy

Personal Information

We collect personal information that is required to:

- offer or provide our services to you;
- maintain our relationship with you; or
- as required under various laws and regulations that govern our business.

Naturally we consider this information to be confidential and take all reasonable steps to protect it under our Privacy Policy. Investwell is bound by the Australian Privacy Principles.

Purpose of collecting personal information

Your personal information will be utilised to:

- provide you with a product or a service;
- to administer your account and our business relationship;
- to manage our rights and obligations in relation to external payment systems;
- to conduct market or customer satisfaction

research;

- to develop and identify products and services that may interest you and (unless you ask us not to) provide you with information about other products and services we offer.

If at any time you do not wish to receive information about other products and services, please inform your adviser in writing or contact our Privacy Officer.

Disclosure to third parties

We may share your personal information with our affiliates, authorising licensee, business units, agents, contractors, insurers, advisers and other organisations when we believe it will enhance the services, we can provide to you or where necessary, to carry out your instructions. This is only done in circumstances where such sharing conforms to law, any applicable confidentiality agreements, our policies and practices, or where a client has consented to such sharing.

Providing the information

It is not compulsory to provide certain personal information requested by us. However, if some of the personal information is not provided by you, we may not be able to advise you, or the advice we give you may not have regard to your investment objectives, financial situation or particular needs.

Access to your information

You can correct and update the personal information we hold about you by contacting, in writing, your adviser or our Privacy Officer. If you wish to access and review personal information, you must submit a written request outlining the relevant terms of reference for attention of the Privacy Officer. We will endeavour to process and respond to requests in a timely manner.

Keeping information secure

We use security procedures and technology to protect the information we hold. Access to and use of personal information within Investwell seeks to prevent misuse or unlawful disclosure of the information.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them. Where the personal information we collect is no longer

required, we delete the information or permanently de-identify it.

If you have an account with us, your account information is password protected and we recommend you do not disclose your password to anyone. To further protect your personal information, your log-in time will automatically expire after a certain period of inactivity.

Standard Fee Schedule

In all instances, payments for services provided will be fully disclosed to you when you agree to receive our services.

Minimum and Maximum Rates for ASX listed securities and derivative transactions

As described in our Financial Services Guide, the ASX Participant through which you trade charges brokerage for transactions of securities and derivatives listed on the Australian Stock Exchange (ASX). Where we charge a fee for transactions of securities and derivatives listed on the ASX the minimum and maximum brokerage rates charged are shown below:

Shares:

A sliding scale from \$66 minimum to \$121 for parcels of stock up to \$50,000 or 0.25% whichever is greater, inclusive of 10% GST.

Options:

Based on the average parcel size (APS) rounded to the nearest 5K, starting at 40K parcel size. Generally, between \$110 to \$121 inclusive of 10% GST plus relevant ACH fees. Client account brokerage fees will be detailed in the Statement of Advice and/or the annual Fee Disclosure.

The ASX Participant will pay a portion of the brokerage you are charged to ANDIKA as authorised by you.

From the portion of brokerage received by ANDIKA, Investwell receives 85% and the remainder is retained by ANDIKA, as authorised by you.

Ongoing Fees:

An initial management fee of 1.0% (inclusive of 10% GST) of funds under management (of the investment value), is payable on a quarterly basis during the life of your product as part of Investwell's ongoing charges. A further management fee of up to 1.0% (inclusive of 10% GST) of funds under management is payable in the last quarter of the financial year based on a tiered return on investment percentage approach, which will be detailed in the Statement of Advice and/or the annual Fee Disclosure.

Your adviser may receive a commission and/or a bonus or benefits based on work performance, where an annual agreement between the client and adviser has been implemented. This will generally only apply to Wholesale Clients.

Miscellaneous Fees and Charges

Please consult the FSG of the ASX Participant that Investwell trades via