

Netwealth Investments Limited Financial Services Guide

25 November 2019

This Financial Services Guide ('FSG') has been prepared and issued by Netwealth Investments Limited (ABN 85 090 569 109, AFS Licence No. 230975) (referred to in this FSG as '**Netwealth**', '**we**', '**our**' or '**us**').

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Purpose of this FSG

A This FSG contains important information about us and the products and services we provide, the remuneration that may be paid to or by us or other persons in relation to our services and how complaints are dealt with. The purpose of the FSG is to help you decide whether to use our products and services.

In this FSG **'our website'** means netwealth.com.au for Netwealth Super Accelerator, Netwealth Super Wrap, Netwealth Wealth Accelerator and Netwealth Investment Wrap, and netwealth.com.au/russellinvestments for Russell Investments Super Series, Russell Investments Wealth Series and Russell Investments Portfolio Service.

If you require further information about us or the products and services we provide, please refer to our website or contact us.

In this FSG **'Netwealth Platform Product'** means a product of the Netwealth Superannuation Master Fund (**'NSMF'**), the Netwealth Wrap Service (**'NWS'**) or the Russell Investments Portfolio Service, as applicable.

Other disclosure documents you may receive

Netwealth disclosure documents

We have issued disclosure documents in relation to each of the financial products we offer. You should be provided with the applicable disclosure document before you apply to invest in or use a product. Its purpose is to provide you with information to assist you to decide whether to acquire, hold or dispose of the relevant Netwealth Platform Product. It contains general information about the product including:

- features and benefits of the product;
- how the product works;
- risks associated with the product; and
- fees and costs you will pay and remuneration we may receive.

The disclosure documents are in the form of a Product Disclosure Statement (**'PDS'**) for our managed investment schemes and NSMF and an IDPS Guide for NWS. The disclosure documents described above are available from your adviser, on our website or by contacting us directly.

Disclosure documents for underlying investments

When you use a Netwealth Platform Product, you choose the underlying investments that you want to hold within your Netwealth Platform Product account.

Before investing in any unlisted financial product offered via a Netwealth Platform Product, you must be given and you should read the current disclosure document for that financial product. The purpose of that disclosure document is to provide you with information to assist you to decide whether to acquire, hold or dispose of the relevant underlying product via your Netwealth Platform Product. The disclosure document for the underlying investment includes information about the product such as risk/return profile, the associated costs and other detailed information. The disclosure document for the underlying investment is available on our website or, if you use a financial adviser in connection with your Netwealth Platform Product, from your financial adviser. Before investing in listed securities via a Netwealth Platform Product, you should have regard to publicly available information about those listed securities.

Statements of advice

If you receive personal financial advice from a financial adviser, your adviser may also give you a statement of advice. The purpose of that document is to give you personal financial advice that you have requested. It sets out, among other things, your financial adviser's advice and the basis for that advice, as well as information about the remuneration that your financial adviser will receive. We do not provide personal financial advice and do not give statements of advice.

About us and the services we provide

Founded in 1999, Netwealth was established to provide innovative web-based wealth management products primarily for financial advisers and clients. Netwealth provides a range of award-winning investment, superannuation and advice solutions and today looks after over \$25 billion on behalf of more than 72,000 clients. Netwealth is a wholly-owned subsidiary of Netwealth Group Limited (**'NGL'**), a company listed on the Australian Securities Exchange.

The financial products and services we provide

We are authorised under our Australian Financial Services Licence ('AFSL') to provide retail and wholesale clients with the following financial services:

- general financial product advice in relation to non-cash payment products, securities, superannuation products, interests in managed investment schemes (including investor directed portfolio services ('IDPSs') and certain life insurance products;
- deal in non-cash payment products, superannuation products and interests in managed investments schemes (including IDPSs); and
- deal in basic deposit products, non-cash payment products, certain life insurance products, interests in managed investment schemes (including IDPSs), securities and superannuation on behalf of others.

We are also authorised to:

- operate the registered managed investment scheme known as the Netwealth Managed Account (ARSN 604 930 252), and registered schemes that only hold financial assets and/or mortgages; and
- provide custodial or depository services.

We act on our own behalf in providing these financial services and are responsible to you for the financial services we provide to you.

We generally provide these services through or in relation to the Netwealth Platform Products. The Netwealth Platform Products provide comprehensive reporting, transactional and administrative services and enable our clients to buy, hold and sell investments from an extensive menu of investment options and manage insurances, via a single account.

We also issue and operate a range of managed funds, including the Global Specialist Series funds and we issue and/or operate the Netwealth Managed Account and the Netwealth Managed Account Service (collectively 'the Netwealth Managed Account'). These products may be included as options available through the Netwealth Platform Products.

In addition to the services we are authorised under our AFSL to provide, we provide administration services to

providers of other financial products or services. These may include, but are not limited to:

- insurers who provide LifeWRAP insurance through the Netwealth Platform Products;
- providers of annuities who make their products available on our website;
- issuers of shares under an initial public offering ('IPO');
- financial advisers; and
- the trustees of self-managed superannuation funds.

In doing so we may provide information and reporting to you and accept instructions from you on behalf of these providers.

We may also provide other administration services or financial information to you by arrangement with you.

The capacities in which we act when we deal with you

The capacities in which we act include the following:

- Registrable Superannuation Entity Licensee (RSE licence number L0000192) and trustee of the NSMF (ABN 94 573 747 704);
- Operator of the NWS;
- Operator of the Russell Investments Portfolio Service;
- Responsible Entity of each of the managed funds we operate;
- Responsible Entity of the Netwealth Managed Account;
- Responsible Entity of the Netwealth Managed Account Service; and
- Custodian for the NSMF, the NWS, the Russell Investments Portfolio Service, the Netwealth Managed Account Service and the managed funds of which we are the Responsible Entity.

We also provide administration services to providers of other financial products or services and we act on their behalf when we provide information to you and accept instructions from you in relation to those products and services.

We are also an ASX Settlement Pty Ltd and Austraclear Limited participant with the ASX Settlement Corporation Limited.

Financial advice we provide

We may give general financial advice about the products and

How you can give us instructions

services we provide or administer. This general advice does not take into account your individual objectives, financial situation or needs. We do not provide personal advice.

You are not required to have or appoint a financial adviser to use our products or services, but we recommend that you consult a financial adviser before making a decision about whether to do so.

How you can give us instructions

When you use a Netwealth Platform Product you may choose the level of online access you require and elect to be able to undertake certain transactions online. If you elect to be able to transact online, then you are able to provide certain instructions through your online account. You can also give us some types of instructions by email or phone, depending on the nature of the instruction and subject to meeting certain security requirements.

If you appoint your financial adviser as your Adviser Representative as defined in the Netwealth Platform Product disclosure documents, then they can undertake certain transactions and provide certain instructions to us on your behalf. The things an Adviser Representative can do on your behalf are set out in the relevant disclosure document.

Where we provide administration services to providers of other financial products or services we will act on the instructions of that provider.

Remuneration we may pay or receive

The remuneration we receive depends on which product or service you use. The disclosure document for each product or service provides detailed information about our fees and remuneration relating to that product or service.

We have arrangements with other issuers of financial products and services for the payment of benefits to us that might reasonably be expected to be capable of influencing us in providing our financial services. These are detailed below.

Fees you pay to us

If you use a Netwealth Platform Product or the Netwealth Managed Account and, if you invest in one or more of our managed investment schemes through a Netwealth Platform Product, we receive the fees that you pay in relation to the services we provide to you in connection

with the product(s). These fees are described in detail in the disclosure document(s) for the product(s).

Where we agree to provide other administration services or financial information to you, we will agree fees for those services with you.

Payments we receive from investment managers

We receive fees from providers of certain investment products available through the Netwealth Platform Products, as detailed in the disclosure document for the relevant Netwealth Platform Product. These fees are paid to us from the provider's own resources and are not an additional cost to you. These fees are retained by us.

In addition, certain investment product issuers may agree to rebate part of their fees in relation to amounts invested in their products through Netwealth Platform Products or the Netwealth Managed Account. This includes rebates of 0.10% p.a. for products that participate in the Investor Rewards program described in the disclosure documents for the Netwealth Platform Products. These amounts are passed on to investors and are not retained by us.

Payments we receive from insurers

We receive administration fees from insurers who provide life insurance through the Netwealth Platform Products. These fees are detailed in the disclosure documents for the Netwealth Platform Products. These fees are paid by the insurer to us for providing services to the insurer in relation to the insurance policies under an administration agreement. This is not an additional charge to you and is paid to us by the insurer.

Payments we receive from other product or service providers

Where we provide administration services to providers of other financial products or services, we may receive fees from those providers. This may include administration fees of up to 0.20% (including GST) of the value of annuities we administer and stamping fees of up to 2.20% (including GST) of the value of shares that we arrange under an IPO. Any such amounts payable to us in relation to products or services used by you will be disclosed to you when you use those products or services.

Payments to Managed Account Model Managers

If we appoint a Model Manager in connection with the Netwealth Managed Account, we may pay the Model Manager a component of the investment management fee received by us in relation to each model they assist us to manage. This is for the ongoing provision of investment expertise and advice regarding the investments of the model.

Payments to advisers and AFSL holders

If you agree an advice fee with your financial adviser for services provided by them (or the AFSL holder they represent) in relation to your interest in Netwealth Platform Products, you can instruct us to deduct upfront, ongoing and/or once only advice fees from your Netwealth Platform Product cash account and pay them to the AFSL holder your financial adviser represents. You can instruct us to terminate any or all of the advice fees at any time. If you do not instruct us to pay advice fees, then no advice fees are charged.

In addition to the advice fees described above, we may from time to time provide benefits such as research assistance or training to a financial adviser or the AFSL holder they represent. The cost of hosting, sponsoring or providing any such benefits is paid out of our funds.

A financial adviser or the AFSL holder they represent may also hold shares in our parent company, NGL, as a result of previous arrangements which may have had reference to the sales the adviser or AFSL holder historically generated in our various products. The costs of any such benefit were borne by the shareholders of the relevant company as at the time the benefit was given, and are not an additional cost to you. Your financial adviser can provide you, on request, with further details or explanation of any interests described above. In addition, under certain 'grandfathered' arrangements made before 1 July 2013, we may make payments to certain AFSL holders in amounts referable to the sales they historically generated in our various products. Such amounts may be up to 0.23% p.a. of funds held in Netwealth Platform Products.

Payments to employees

Our employees and the employees of our related bodies corporate are remunerated by way of a salary and may have certain short or long-term incentives. Our employees have no direct entitlement to receive any portion of the fees or other benefits (if any) paid to us in connection with

the financial services we provide. However, fees or other benefits paid to us may indirectly benefit our employees, our related bodies corporate and their employees, and their respective associates. For example, if we achieve certain financial performance objectives, a short term or long-term incentive may be payable to those employees involved in assisting us to achieve these objectives. Short and long-term incentives may consist of bonus payments and/or allocations of shares, rights or options to acquire shares in NGL.

Our employees and directors and the employees and directors of our related bodies corporate and their respective associates may also hold shares in our parent company, NGL (including where shares have been given in connection with an employee's employment status or performance), and they may indirectly benefit from fees and other benefits received by us through enhancement in the value of their shares in our parent company or through income derived from those shares.

Payments to our related parties

NGL is our parent company. We pay a subsidiary of NGL, Netwealth Group Services Pty Ltd ('NGS'), for delivering various services in relation to our financial products. These include providing administration, management, information technology and other services. NGS does not provide general or personal advice and does not hold an AFSL.

We also pay another subsidiary of NGL, Netwealth Holdings Limited, a fee for capital provided to us to meet prudential requirements in relation to NSMF.

Benefits from corporate actions

We may benefit where we act as a principal in a corporate action, as explained in the disclosure documents for the Netwealth Platform Products.

Changes to laws relating to payments and benefits

Effective 1 July 2013, there were changes to laws governing some of the payments and benefits described above. Certain payments and other benefits we give or receive under arrangements which were in place prior to 1 July 2013 are currently allowed to continue ('grandfathered').

Statement of particulars about remuneration

Within a reasonable time after you are given this FSG and before you receive any of the financial services described in this FSG, you may request a statement from us setting out the particulars of any remuneration (including commissions) or other benefits that may be paid.

How we deal with complaints

We have arrangements in place to consider and seek to resolve any complaints about the services we provide to you. If you have a complaint about us, our products or services or other products available on our website, you may contact us by email, by telephone or in writing to:

The Complaints Manager – Investor Services
Netwealth Investments Limited
PO Box 336
South Melbourne VIC 3205

Freecall: 1800 888 223 (within Australia)
Phone: 03 9655 1300
Email: complaints@netwealth.com.au

We will seek to resolve your complaint within 45 days of receiving it. During this time we will update you on the progress of your complaint.

We are a member of the Australian Financial Complaints Authority ('AFCA'). AFCA is an independent external dispute resolution service established by the Federal Government, which deals with complaints from customers involving financial services and products. If you are not satisfied with the result of our internal complaints procedure, or it has taken longer than 45 days to receive a response, you may be able to refer your complaint to AFCA. AFCA will review your complaint without charge. AFCA may be contacted by email, telephone or in writing to:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Phone 1800 931 678 (free call)
Email info@afca.org.au
Website www.afca.org.au

To allow AFCA to easily identify us, please quote our code number 10709.

Complaints about underlying investments

Where you invest in a financial product through a Netwealth Platform Product, you will have access to the same dispute resolution procedure as those provided by the product provider for the investors investing directly in that product. If you have a complaint in relation to a product that you have invested in through a Netwealth Platform Product, we will assist you in attempting to resolve your complaint with the product provider by contacting the product provider on your behalf and, where necessary, providing information about your investment in the product to the product provider.

While we take reasonable steps to facilitate the resolution of investors' complaints with product providers, we have no control over and are not responsible for the actions (or inaction) of any product provider in responding to a complaint.

Complaints about margin loans

We have agreements in place with certain lenders to permit investors to borrow funds to acquire investments and hold those investments through the NWS or the Russell Investments Portfolio Service. If you have a margin loan linked to investments held in an NWS account or a Russell Investments Portfolio Service account, the terms and conditions governing that loan arrangement are as agreed between you and the lender. If you have a complaint about the margin loan, you must deal directly with the lender using the dispute resolution system described in the lender's Financial Services Guide. We will assist you in dealing with the lender by providing you with contact details for the lender and information about the investments affected by the margin loan. However, we have no control over and are not responsible for the actions (or inaction) of any lender in responding to a complaint.

Complaints about insurance

If you have a complaint regarding personal insurance held through the NSMF under the Netwealth Group Policy, you should contact us. Your complaint will be dealt with under our complaint resolution procedure described above. If you have an insurance policy linked to a Netwealth Platform Product using 'LifeWRAP' (which is described in the disclosure document for the Netwealth Platform Product), you have entered this policy directly with the insurer. If you have a complaint about the insurance policy, you must deal directly with the insurer using the

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dispute resolution procedure described in the insurer's Product Disclosure Statement. We will assist you in dealing with the insurer by providing you with contact details for the insurer and information about the payment of premiums. However, we have no control over and are not responsible for the actions (or inaction) of any insurer in responding to a complaint.

Complaints about advice from your adviser

If you have a complaint about advice that you have received from your financial adviser, you need to contact the adviser or the AFSL holder they represent. The Financial Services Guide provided by your adviser should outline their dispute resolution procedure. We are not responsible for your financial adviser, the advice that they provide or their actions (or inaction) in responding to a complaint.

Compensation and insurance arrangements

We hold a professional indemnity insurance policy suitable for our business activities. This seeks to ensure that we are able to compensate you if you suffer any loss as a result of us (or any of our representatives) breaching certain legal obligations to you. These arrangements satisfy the requirements set out under section 912B of the *Corporations Act 2001*.

Privacy

When you complete an application for a Netwealth Platform Product or interact with us in other ways, we collect personal information from you. While you are an investor with us, we may collect additional personal information from you or others. We are committed to ensuring that the personal information we collect is handled responsibly and in accordance with the *Privacy Act 1988*. As part of our commitment to ensuring the safety of our clients' private and confidential information and in accordance with our obligations, we have established and implemented a Privacy Policy which sets out how we manage your personal information. A copy of our Privacy Policy is available on our website or free of charge by contacting us.

We are not able to process your application or administer your Netwealth Platform Product if you do not provide us with your relevant personal information. We collect, use and disclose your personal information in accordance with our Privacy Policy. You may request access to the personal

information we hold, subject to certain exceptions under the *Privacy Act*. Our Privacy Policy explains our policies and practices with respect to the collection and management of personal information we may collect from you. Our Privacy Policy also contains information about how to complain if you have a concern about our handling or use of your personal information.