

Financial Services Guide

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About this guide

This FSG is an important legal document which we are required by law to give to you before we provide any financial services. The document explains the financial services provided by Acumen Asset Management Pty Ltd ("Acumen") and your adviser (who is authorised through Acumen). It is designed to help you make a fully informed decision about whether you want to use our services, and covers the following:

1. The financial services we offer and the license we operate under;
2. The types of financial products we are authorised to advise on;
3. How we (and other related entities) are remunerated for these services;
4. Details of our internal and external complaints handling procedures and how you can access them.

If you choose to utilise our financial services you may also receive from us a Statement of Advice (SOA) and/or Record of Advice (ROA) and/or a Product Disclosure Statement (PDS).

If we provide you with personal financial product advice rather than general financial product advice, we will initially provide you with an SOA. The SOA will contain our advice, the basis on which it is given and information about fees, commissions and any associations which have the potential to influence the advice.

On an ongoing basis, an ROA may be provided instead of an SOA if there have been no significant changes in your personal circumstances or the basis of the advice has not significantly changed since your last SOA was provided. You have the right to request a copy of your ROA at any time.

To invest in many financial products, you must complete the application form attached to the relevant PDS. The PDS contains information about the particular product and will assist you in making an informed decision about that product.

Not Independent

We may receive initial and ongoing commission on life insurance products and the placement of Initial Public Offerings and buying and selling listed investments through Canaccord Genuity as explained in this FSG under the heading 'How we are paid'.

For these reasons, we do not refer to ourselves as independent, impartial or unbiased.

Who are we?

Acumen Asset Management Pty Ltd is responsible for the financial advice and services provided to clients by all Authorised Representatives of Acumen Asset Management Pty Ltd's AFSL.

Established in 2001, Acumen Asset Management is a leader in the Australian financial services marketplace, offering a range of financial products and services that challenge traditional investment boundaries and offer diverse capabilities.

Acumen Asset Management Pty Ltd is a company of qualified advisers with over 40 years of combined experience. We have clients all over Australia who are using our experience to create & protect wealth or enjoy a comfortable retirement. Our goal is to utilise our clients' assets, as well as their income, to achieve their personal goals without adversely affecting their current lifestyle. We are committed to providing high-quality advice and continued excellence in our service to you.

What financial services do we offer?

Examples include:

- Financial planning
- Direct shares
- Investment strategy advice
- Superannuation strategies, including self managed superannuation funds
- Life, disability, income protection and trauma insurance, including investment life insurance
- Tax effective investments
- Centrelink benefits advice
- Retirement planning advice
- Portfolio review services
- Ongoing advisory services

What financial services are we authorised to provide?

This licence authorises Acumen Asset Management Pty Ltd to provide financial product advice for the following financial products:

- (i) deposit and payment products limited to:
 - (A) basic deposit products;
 - (B) deposit products other than basic deposit products;
- (ii) derivatives limited to:
 - (A) old law securities options contracts and warrants;
- (iii) foreign exchange contracts;
This licence authorises Acumen Asset Management Pty Ltd to carry on a financial services business to provide financial product advice for the following classes of financial products:
- (i) deposit and payment products limited to:
 - (A) basic deposit products;
 - (B) deposit products other than basic deposit products;
- (ii) derivatives limited to:
 - (A) old law securities options contracts and warrants;
- (iii) foreign exchange contracts;
- (iv) debentures, stocks or bonds issued or proposed to be issued by a government;
- (v) life products including:
 - (A) investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds; and

- (B) life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;
- (vi) interests in managed investment schemes including:
 - (A) investor directed portfolio services;
- (vii) retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997);
- (viii) securities;
- (ix) standard margin lending facility; and
- (x) superannuation;

Deal in a financial product by:

- (i) issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products:
 - (A) derivatives limited to:
 - (1) old law securities options contracts and warrants;
- (ii) applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (A) deposit and payment products limited to:
 - (1) basic deposit products;
 - (2) deposit products other than basic deposit products;
 - (B) derivatives limited to:
 - (1) old law securities options contracts and warrants;
 - (C) foreign exchange contracts;
 - (D) debentures, stocks or bonds issued or proposed to be issued by a government;
 - (E) life products including:
 - (1) investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds; and
 - (2) life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;
 - (F) interests in managed investment schemes including:
 - (1) investor directed portfolio services;

Who is your Adviser?

Simon Thompson - BComm GDApFinn SSA™ TFA

Simon Thompson is the Managing Director and an Authorised Representative (Authorised Representative: 290160) of Acumen Asset Management Pty Ltd. Simon has an extensive background in Financial Advice.

He specialises in portfolio management and providing strategic advice for clients in Australian and international equities, cash, fixed interest and property. He also assists clients with their overall financial needs including investment and superannuation planning, debt and gearing management, wealth protection and insurance planning.

Simon helps clients build long term strategies to ensure that goals can be met such as extinguishing debt, building wealth or retiring comfortably.

- Bachelor of Commerce – majoring in Finance and Financial Planning
- Graduate Diploma in Applied Finance and Investment – Portfolio management specialisation
- Self Managed Superannuation Association of Australia – specialist SMSF advisor accreditation
- Tax Practitioners Board – Tax Financial Adviser No: 25202576
- Completed all FASEA education requirements and passed the FASEA exam in 2019

Gavin Polmans B Soc Sci, Adv. Dipl (Financial Services) SSA™ TFA

Gavin Polmans is a Director and an Authorised Representative (Authorised Representative: 322134) of Acumen Asset Management Pty Ltd. Gavin has an extensive background in Financial Advice spanning over 26 years.

Gavin also assists clients with their overall financial needs including investment and superannuation planning, debt and gearing management, wealth protection and insurance planning. Gavin has a very deep knowledge of insurance and therefore this is a specialisation that he adds to Acumen.

Gavin helps clients build long term strategies to ensure that goals can be met such as protecting their way of life, extinguishing debt, building wealth or retiring comfortably.

- Bachelor of Social Science – Majoring in Business Administration and Marketing
- Advanced Diploma of Financial Services – Financial Planning specialisation
- Self Managed Superannuation Association of Australia – specialist SMSF advisor accreditation
- Member of the Association of Financial Advisers
- Tax Practitioners Board – Tax Financial Advisor No: 24943300
- Passed the FASEA Exam in 2019

Eric Willson

Eric Willson is a valued member of staff at Acumen Asset Management Pty Ltd. Founder and Chairman of Acumen Asset Management, Eric Willson holds a Bachelor of Commerce Degree with a major in Economics, is a Fellow of the Financial Services Institute of Australia and a Master Stockbroker of the Securities and Derivatives Industry Association. Eric has over 30 years of experience in managing, dealing and advising on all classes of stock market securities. He has managed Australian equities, fixed interest, property and cash as well as international portfolios in the United Kingdom, Europe, Hong Kong, Singapore and the United States. Eric is not a client adviser or Representative of our AFSL, he runs our investment research function.

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www.acumenasset.com.au

Eric's responsibilities include Chairmanship of Acumen's Investment Management Committee as well as supporting the Client Portfolio Management division.

Eric's qualifications are as follows:

- Bachelor of Commerce (Econ), University of New South Wales (B Com);
- Fellow of the Financial Services Institute of Australasia (F Fin);
- Master Stockbroker of the Securities and Derivatives Industry Association (SDIA).

To the extent that we authorise an Acumen Asset Management Pty Ltd representative to do so, the representative can help you to apply for the financial products referred to in this FSG and can also give you financial product advice in relation to them.

If an Acumen Asset Management Pty Ltd representative is unable to provide you with a financial service or a financial product that you are interested in, the representative may refer you to another representative who can.

What Do We Expect From You?

We expect that you will provide us with accurate information that we request so that we can provide advice that is in your best interests.

We expect that you will use our advice to enable you to make informed financial decisions.

We expect that where appropriate you inform your adviser of any changes that may influence your future objectives.

As a financial service provider, we have an obligation under the Anti Money Laundering and Counter-Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's licences. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

How are we paid?

Our initial meeting is free of charge. After the first meeting, your adviser will discuss the fees and charges that will be applicable to your individual circumstances.

We choose to be flexible in earning our fees and offer you the flexibility to select the fee payment method most suitable to you. From our professional standpoint, Acumen Asset Management Pty Ltd all of our advisers are salaried employees.

Due to the varying nature of individual client cases, our fee for SOA preparation, implementation and our portfolio review service process will be disclosed on an individual basis and may include the following:

Fee for Service - fixed dollar based fee

This fee is based on an estimation of our timed costs. Our estimation of cost is based on our hourly rates (inclusive of GST), which are as follows:

Advisor	\$440
Para planner	\$275
Administration	\$110

Fee for Service – Funds Under Management based fee

This fee is based on a percentage of the funds you have invested with us and is paid either monthly or quarterly. This fee applies on a spot basis (i.e. not a sliding scale). The portfolio management fee range (inclusive of GST) is as follows:

Funds Under Management	Portfolio Management Fee
Up to \$1,000,000	0.99%
\$1,000,001 to \$2,000,000	0.88%
\$2,000,001 to \$3,500,000	0.77%
Over \$3,500,000	0.66%

You can choose the option that best suits you.

For example, if your investment funds are \$100,000, we would charge you 0.99% pa, which equals \$990 p.a. on those funds. Please note that we cannot levy a fee based on a percentage of funds if the funds are borrowed (for example under a personal loan, home equity or margin loan). We will advise you of any alternative fee for service arrangement on those funds if applicable.

Additional Fixed Administration fee

In addition to the above fees there may be an administration fee of \$550 (inclusive of GST) per quarter charged. This fee will be payable monthly.

Please note that all of the above fees are discussed and agreed upon with you on an individual basis.

Commissions

We may receive up to 1.1% (inclusive of GST) of the invested amount from fund managers, stock brokers and other product issuers whose investment products we recommend to you. Also we receive 60% of any applicable brokerage that you are charged by Canaccord less 0.1% of the value of the trade (or min \$25). This payment is to remunerate us for work that Acumen does to ensure your recommended investments are implemented correctly and in a timely fashion including "dollar cost averaging" and "working positions" to ensure the best outcome. This is in lieu of an implementation fee which we do not charge. We may receive up to 66% (inclusive of GST) of the annual premium in year 1 up front commission and then up to a maximum of 22% (inclusive of GST) from year 2 onwards for insurance products we recommend. Where up front and ongoing commission is the same, there is not a legislated ongoing maximum however product providers generally pay up to 33% (inclusive of GST). For insurance products purchased before 1 January 2018, we may continue to receive commissions in the same manner as would have been advised to you at the time you obtained the product(s).

Combination of fees and commissions

Full disclosure of all fees will be contained in the Statement of Advice that we prepare for you. However, you will not be charged unless you have agreed to engage in our service.

Ongoing fee arrangements

If we have an ongoing fee arrangement with you which exceeds 12 months, then you will receive from us a Fee Disclosure Statement annually setting out the fees you have paid to us, the services that we contracted to provide and what we did provide to you over that period.

What other benefits might we receive?

Your adviser may qualify for other benefits:

- prizes, awards, hospitality events (e.g. tennis, football, etc)

Acumen Asset Management Pty Ltd and its representatives may from time to time receive a non-cash benefit from preferred product providers by way of sponsorship of educational seminars, conferences or training days. Details of benefits received with a cash value of \$100-\$300 are maintained on a Register which is available for sighting upon request.

You have a right to request further information in relation to the remuneration, the range of amounts or rates of remuneration, and soft dollar benefits received by the licensee and/or authorised representative.

Do any relationships exist which might influence the service or advice I receive?

There are no relationships that will influence the advice that you receive from Acumen Asset Management Pty Ltd.

Will you give me advice that is suitable to my investment needs and financial circumstances?

Yes. However, to do so we need to find out your individual investment objectives, financial situation and needs before we recommend any investment or risk products to you. You have the right not to divulge this information to us, if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

What should I know about any risks of the investments or investment strategies recommended to me?

We will explain to you any significant risks of investments, insurances and strategies that we recommend to you.

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

We maintain a record of your personal profile that includes details of your investment objectives, financial situation and needs. We also maintain records of any recommendations made to you. If you wish to examine your file, you should ask us and we will make arrangements for you to do so.

A copy of our privacy policy will be provided upon your request.

Information you provide us may be shared with external parties who we engage to assist us with preparation of your work. These may be in Australia or overseas in Cambodia. Your personal information is collected for the primary purpose of providing you with the financial services outlined in this FSG.

Can I tell you how I wish to instruct you to buy or sell my investment?

Yes. You may specify how you would like to give us instructions. For example, by telephone, email or other means.

What kind of compensation arrangements are in place and are these arrangements complying?

Acumen Asset Management Pty Ltd confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity insurance in accordance with s.912B of the Corporations Act 2001 (as amended). In particular, our Professional Indemnity insurance, subject to its terms and conditions, provides indemnity up to the Sum Insured for Acumen Asset Management Pty Ltd and our authorised representatives / representatives / employees in respect of our authorisations and obligations under our Australian Financial Services Licence. This insurance will continue to provide such coverage for any authorised representative / representative / employee who has ceased work with Acumen Asset Management for a minimum of 7 years from the date of ceasing the relationship.

Acumen Asset Management Pty Ltd is also required to maintain solvency requirements under its Authorised Financial Services Licence obligations with ASIC.

What should I do if I have a complaint?

We are committed to providing quality advice to our clients. This commitment extends to providing accessible Complaint Resolution mechanisms for our clients. If you have any complaint about the service provided to you, you should take the following steps:

1. Contact your adviser and tell your adviser about your complaint or if you prefer, contact management directly.
2. If your complaint is not satisfactorily resolved within 7 days please contact Acumen Asset Management Pty Ltd on 1800 639 958 or put your complaint in writing and send it to us at, Acumen Asset Management Pty Ltd, Suite 2.04, 1 Crescent Road, Glen Iris VIC 3146. We will try and resolve your complaint quickly and fairly.

If we cannot reach a satisfactory resolution, you can raise your concerns with the Australian Financial Complaints Authority (AFCA) on 1800 931 678. Acumen Asset Management is a member of this complaints resolution service. The Australian Securities & Investments Commission (ASIC) also has a freecall Infoline on 1300 300 630 which you may use to make a complaint or obtain information about your rights.